

TOMORROW'S SCHOLAR[®]

529 Plan



... connecting to the future



Program Description and Participation Agreement

March 31, 2026

Administrator: The Wisconsin College Savings Program Board

PROGRAM DESCRIPTION STATEMENT

Please keep this Program Description (including the Participation Agreement) with your other records about the Tomorrow's Scholar® 529 Plan, which is offered by the State of Wisconsin. You should read and understand this Program Description before you make contributions.

Definitions for capitalized terms may be found under "Key Terms" in this Program Description.

You should rely only on the information contained in this Program Description (including the Participation Agreement). No person is authorized to provide information that is different from the information contained in this Program Description (including the Participation Agreement). The information in this Program Description is subject to change without notice.

This Program Description does not constitute an offer to sell or the solicitation of an offer to buy, nor shall there be any sale of, a security in the Tomorrow's Scholar® 529 Plan by any person in any jurisdiction in which it is unlawful for such person to make such an offer, solicitation or sale.

In particular, if you or your intended beneficiary reside in a state other than Wisconsin or have taxable income in a state other than Wisconsin, it is important for you to note that if that state has established a 529 Plan, such state may offer favorable state tax or other benefits such as financial aid, scholarship funds, and protection from creditors that are available only if you invest in that state's 529 Plan. You should consult with a qualified advisor or review the offering documents for that state's 529 Plan to find out more about any such benefits (including any applicable limitations) and to learn how they may apply to your specific circumstances. Those benefits, if any, should be one of the many appropriately weighted factors you should consider before making a decision to invest in the Tomorrow's Scholar® 529 Plan.

An Account in the Tomorrow's Scholar® 529 Plan should be used only to save for Qualified Education Expenses of a Beneficiary. Such Accounts are not intended for use, and should not be used, by any taxpayer for the purpose of evading federal or state taxes or tax penalties. The tax information contained in this Program Description was written to support the promotion and marketing of the Tomorrow's Scholar® 529 Plan and was neither written nor intended to be used, and cannot be used, by any taxpayer for the purpose of avoiding federal or state taxes or tax penalties. Taxpayers should consult with a qualified advisor to seek tax advice based on their own particular circumstances.

Participation in the Tomorrow's Scholar® 529 Plan does not guarantee that contributions and the investment return on contributions, if any, will be adequate to cover future tuition and other education expenses or that a Beneficiary will be admitted or permitted to continue to attend an educational institution.

Before making any contributions to the Tomorrow's Scholar® 529 Plan, please read and understand the Program Description, including any supplements that may be issued from time to time. These documents contain important information about Tomorrow's Scholar® 529 Plan, including information about investment risks, and should be retained for future reference.

The information contained in this Program Description is considered to be accurate as of the date on the front cover and is subject to change without notice, and neither delivery of this Program Description nor any sale of interests in the Tomorrow's Scholar® 529 Plan shall, under any circumstances, create any implication that there has been no change in the affairs of the Tomorrow's Scholar 529 Plan® or the Program Manager since the date of this Program Description.

The Wisconsin Department of Administration has entered into a management agreement with TFI. TFI subcontracted to the Program Manager whereby the Program Manager would provide management, administration, distribution, recordkeeping, and certain administrative services to the Tomorrow's Scholar® 529 Plan.

No dealer, broker, salesperson, or other person has been authorized by the State, the Board, TFI, or the Program Manager to give any information or to make any representations other than those contained in this Program Description, and, if given or made, such other information or representations must not be relied upon as having been authorized by the State, the Board, TFI, or the Program Manager. Pursuant to exemptions from registration available for securities issued by a public instrumentality of a state, no security issued by the Tomorrow's Scholar® 529 Plan has been registered with or approved by the SEC or any state securities commission.

This Program Description is not intended to constitute, nor does it constitute, legal or tax advice. This Program Description is intended to substantially comply with the Disclosure Principles Statement No. 6 adopted by the College Savings Plan Network, an affiliate of the National Association of State Treasurers, on July 1, 2017. The Tomorrow's Scholar® 529 Plan's offering materials consist of the Program Description, including any supplements.

The Options (as described in "Appendix A: Investment Options"), the investments held by the Options, and the securities issued by the Tomorrow's Scholar® 529 Plan (for example, your investment in an Option) are not insured or guaranteed by the United States; the Federal Deposit Insurance Corporation; the State; the Board; any agency or instrumentality of the federal government or of the State; any underlying mutual funds or other issuers of investments held by the Options; TFI, the Program Manager, or any of their affiliates; any agent, representative, or subcontractor retained in connection with the Tomorrow's Scholar® 529 Plan; or any other person. Account values vary based on Option performance and may be more or less than the amount invested. Your Account may lose value. Account Owners should periodically assess, and if appropriate, adjust their investment choices with their investment time horizons, risk tolerances and investment objectives in mind.

In addition to the Tomorrow's Scholar® 529 Plan, the State of Wisconsin also offers Edvest, a 529 Plan sold directly to investors. Edvest is not described in this Program Description; may offer different investment options including different underlying funds with different investment advisers or sub-advisers; may offer different benefits, and may be marketed differently than the Tomorrow's Scholar® 529 Plan. Edvest may also assess different fees, withdrawal penalties, and sales commissions, if any, relative to those assessed by the Tomorrow's Scholar® 529 Plan. Offering materials for Edvest are available online at www.edvest.com.

KEY TERMS

Capitalized terms used in this Program Description are defined as follows:

529 Plan: An education savings plan under Section 529 of the Code.

Account: An account in the Tomorrow's Scholar® 529 Plan.

Account Owner: An owner of an Account. An Account Owner may include an individual of legal age, an individual's legal representative, a trust, an estate, or an organization described in Section 501(c)(3) of the Code and exempt from taxation under Section 501(a) of the Code with the authority to open an Account for the Beneficiary, or a qualified custodian under the UGMA/UTMA. In certain cases, the Account Owner and Beneficiary may be the same person.

Age-Based Option: Each Option that is designed for those saving for the college education of the Beneficiary and that invests in multiple Underlying Funds and that has target investment allocations that changes over time based on the Beneficiary's age indicated on the Account Application or later provided to the Program Manager. Age-Based Options may not be appropriate for K-12 time horizons.

AIP: Automatic Investment Plan, which allows periodic automated debits from a checking or savings account at another financial institution to contribute to an Account.

Beneficiary: The individual designated by an Account Owner to receive the benefit of an Account.

Board: Wisconsin College Savings Program Board.

Business Day (or business day): A business day is any day that the NYSE is open for regular trading, and a business day closes at the same time that regular trading closes on the NYSE. Regular trading on the NYSE normally closes at 4:00 p.m. Eastern Time, but closes early on certain scheduled days and may close early in the case of an emergency. Units in the Options are valued as of the close of each business day for purposes of investment of contributions, withdrawal requests, transfer requests, and asset-based fees and expenses.

CDSC: Contingent deferred sales charge.

Code: Internal Revenue Code of 1986, as amended.

Distributor: Voya Investments Distributor, LLC.

Edvest: Edvest College Savings Plan.

Eligible Educational Institution: An institution as defined in Section 529(e) of the Code. Generally, the term includes accredited postsecondary educational institutions in the United States and certain institutions abroad that offer credit toward an associate's degree, a bachelor's degree, a graduate-level or professional degree, or another recognized postsecondary credential and certain postsecondary vocational and proprietary institutions. Eligible Educational Institutions must be eligible to participate in U.S. Department of Education student financial aid programs under Title IV of the Higher Education Act of 1965 (20 U.S.C. § 1088).

EFT: Electronic Funds Transfer.

IRS: U.S. Internal Revenue Service.

K-12 Institution: Any elementary or secondary public, private or religious school.

Member of the Family: An individual defined in Section 529 of the Code as follows:

- Father, mother, or an ancestor of either;
- Child or a descendant of a child;
- Stepfather or stepmother;
- Brother, sister, stepbrother, or stepsister;
- Brother or sister of the father or mother;
- Brother-in-law, sister-in-law, son-in-law, daughter-in-law, father-in-law, or mother-in-law;
- Son or daughter of a brother or sister;
- Spouse of the Beneficiary or of any of the individuals mentioned above; or
- First cousin.

For this purpose, a child includes a son, daughter, stepson, stepdaughter, and eligible foster child. A brother or sister includes a half-brother and half-sister.

MSRB: Municipal Securities Rulemaking Board.

NAV: Net Asset Value. The NAV per unit of an Option is calculated by dividing the Option's net assets by the number of outstanding units on a given date.

Non-Qualified Withdrawal: A Non-Qualified Withdrawal generally is any withdrawal from an Account that is **not**:

- A Qualified Withdrawal; or
- A Qualified Rollover.

NRSRO: Nationally Recognized Statistical Rating Organization.

NYSE: New York Stock Exchange.

Option: Any investment option available to Account Owners through the Tomorrow's Scholar® 529 Plan.

Program Description: This program description and participation agreement, including any supplements that may be issued from time to time.

Program Manager: Voya Funds Services, LLC; Voya Investments Distributor, LLC; and certain affiliates which collectively provide management, administration, distribution, recordkeeping, and certain administrative services to the Tomorrow's Scholar® 529 Plan.

Qualified Education Expenses: A “qualified higher education expense” as defined in section 529(e)(3) of the Code, as amended by Pub. L. No. 115-97, and elementary and secondary school expenses for tuition described in section 529(c)(7) of the Code, subject to the limitations imposed by section 529(e)(3)(A) of the Code. The definition of “qualified higher education expense” will automatically conform to any changes to the Code. Generally, Qualified Education Expenses for higher education include tuition, fees, books, supplies, and equipment required for the enrollment or attendance of the Beneficiary at an Eligible Education Institution, expenses for the purchase of computer or peripheral equipment, computer software, or Internet access and related services used primarily by the Beneficiary during any of the years the Beneficiary is enrolled at an Eligible Educational Institution, certain room and board expenses, as well as expenses for special needs services in the case of a special needs Beneficiary who incurs such expenses in connection with enrollment or attendance at an Eligible Educational Institution, and certain postsecondary credentialing expenses. Expenses for computer software designed for sports, games, or hobbies are not Qualified Education Expenses for higher education unless the software is predominantly educational in nature. For both federal and Wisconsin tax purposes, Qualified Education Expenses includes K-12 student expenses (up to the then applicable maximum amount described in “Qualified Withdrawals” in the Program Summary).

Additionally, for federal and Wisconsin tax purposes, any reference to Qualified Education Expenses also includes: (i) expenses for fees, books, supplies, and equipment required for the participation of a Beneficiary in an apprenticeship program registered and certified with the Secretary of Labor under the National Apprenticeship Act (“Apprenticeship Expenses”); and (ii) amounts paid as principal or interest on any qualified education loan of either the Beneficiary or a sibling of the Beneficiary, up to a lifetime limit of \$10,000 per individual (“Loan Repayments”). Distributions treated as Qualified Education Expenses with respect to the loans of a sibling of a Designated Beneficiary will count towards the limit of the sibling, not the Designated Beneficiary. Loan Repayments may impact student loan interest deductibility.

State tax treatment of withdrawals for K-12 tuition expenses, apprenticeship expenses required for the participation in an apprenticeship program registered and certified with the Secretary of Labor under the National Apprenticeship Act, certain postsecondary credential expenses, and payment of qualified education loans is determined by the state where you file state income tax. Please consult with a tax advisor before withdrawing funds for any such expenses.

Qualified Withdrawal: Any distribution that is used to pay for the Qualified Education Expenses of a Beneficiary incurred in the same tax year as the withdrawal or potentially in a prior or future tax year.

Qualified Rollover: A distribution of amounts from a 529 Plan which, within 60 days of such distribution, is transferred: (1) to another 529 Plan for the benefit of the same beneficiary, provided that it has been at least 12 months from the date of a previous transfer to a 529 Plan for that beneficiary; (2) to the credit of another beneficiary under a 529 Plan who is a Member of the Family of the beneficiary of the account with respect to which the distribution was made; or (3) to a Section 529A ABLE account for the beneficiary or Member of the Family of the beneficiary, subject to ABLE account contribution limits.

Special Rollover to Roth IRAs from Long-Term Qualified Tuition Programs

Rollovers will be permitted from a 529 Account to a Roth IRA without incurring federal or Wisconsin income tax or penalties, subject to the following conditions:

- The Account must have been open for 15 or more years, ending with the date of the rollover;
- Contributions and associated earnings that you transfer to the Roth IRA must have been in the Account for more than 4 years, ending with the date of the rollover;
- The rollover does not exceed the lifetime maximum amount of \$35,000 per designated beneficiary to be rolled over from 529 plan accounts to Roth IRAs;
- The rollover is into a Roth IRA maintained for the benefit of the Beneficiary on the Account; and
- The rollover is sent directly to the Roth IRA.

Please note that Roth IRA income limitations are waived for 529 plan rollovers to Roth IRAs; however, a Roth IRA contribution is subject to the Roth IRA contribution limit for the taxable year applicable to the Beneficiary for all individual retirement plans maintained for the benefit of the Beneficiary.

The IRS may issue additional guidance that may impact 529 plan account rollovers to Roth IRAs, including the above referenced conditions.

State tax treatment of rollovers to a Roth IRA are determined by the state where you file state income tax. Account Owners and Beneficiaries should consult with a qualified tax professional before withdrawing funds for any such rollovers. You are responsible for determining the eligibility of a 529 plan to Roth IRA rollover including tracking and documenting the length of time the 529 plan account has been opened and the amount of assets in your 529 plan account eligible to be rolled into a Roth IRA. **To request a rollover to a Roth IRA, please first contact your Roth IRA administrator to determine their ability and requirements to receive the rollover. Then, submit any required Roth IRA form available from your Roth IRA administrator. If none provided, then submit the Plan rollover form found online at <https://529wi.voya.com> or by calling (866) 677-6933.**

SEC: U.S. Securities and Exchange Commission.

Single Fund Option: Each Option that invests in a single Underlying Fund or, in one case, two Underlying Funds.

State: State of Wisconsin.

Static Allocation Option: Each Option that invests in multiple Underlying Funds and that has fixed target investment allocations based upon a specific risk- or style-based investment strategy (unless a modification is approved by the Board).

TFI: TIAA-CREF Tuition Financing, Inc.

Transfer Agent: BNY Mellon Investment Servicing (US) Inc., which provides transfer agency and recordkeeping services for the Tomorrow’s Scholar® 529 Plan.

Trust: The Wisconsin College Savings Program Trust Fund, as created by the State.

UGMA: Uniform Gifts to Minors Act.

UTMA: Uniform Transfers to Minors Act.

Underlying Funds: Mutual funds and other investments in which the Options invest.

The following summary is intended only to highlight key features of the Tomorrow's Scholar® 529 Plan. It does not fully describe the Tomorrow's Scholar® 529 Plan. This summary is qualified in its entirety by reference to the remainder of this Program Description.

PROGRAM SUMMARY – EFFECTIVE JANUARY 1, 2026

The program	The Tomorrow's Scholar® 529 Plan of the Wisconsin College Savings Program Trust Fund.
Program Manager	Voya Funds Services, LLC; Voya Investments Distributor, LLC; and certain affiliates, which collectively provide management, administration, distribution, recordkeeping, and certain administrative services to the Tomorrow's Scholar® 529 Plan.
Choosing a unit class	You can choose from among several unit classes, each with different sales charges and expenses. If no unit class is designated, Class A units with initial sales charge will be automatically selected. See "Choosing a Unit Class" on page 9 for details.
Minimum initial contribution	\$250 per Option selected for investment. The minimum initial contribution is waived for Account Owners that make contributions through AIPs or payroll direct deposits of \$25 or more per month. See "Minimum Contributions" on page 13 for details.
Minimum subsequent contribution	\$25 per Option selected for investment. See "Minimum Contributions" on page 13 for details.
Maximum contribution limit	\$613,240. See "Maximum contribution" on page 14 for details.
Residency requirement	None.
Beneficiary age limit	None – the Beneficiary may be any age, from newborn to adult.
Eligible schools	For higher education, savings may be used at any Eligible Educational Institution. See "Eligible Educational Institutions" on page 15 for details. For K-12 education, savings may be used for student expenses at elementary or secondary public, private or religious schools up to a maximum of \$20,000 per taxable year per Beneficiary from all 529 Plans. See "K-12 Student Expenses" on page 15 for details.
Federal tax benefits For the 2026 tax year	Earnings accrue free of federal income tax. Qualified Withdrawals are not subject to federal income tax, including the additional 10% federal tax. There is no federal gift tax on contributions of up to \$19,000 per year per Beneficiary (\$38,000 for married couples electing to split gifts); or on a lump sum gift of \$95,000 (single filer) and \$190,000 (married couples) per Beneficiary that would be pro-rated over five taxable years. Contributions are generally considered completed gifts to the Beneficiary for federal gift and estate tax purposes. Each Account Owner has a lifetime exemption that may be applied to gifts in excess of the annual exclusion amounts referred to above or an individual's gross estate. This lifetime exemption is adjusted for inflation and is currently \$15,000,000 for each Account Owner. A married couple may elect to split gifts and apply their combined exemption of \$30,000,000 to gifts by either of them. The top gift tax rate is 40%. See "Federal gift and estate tax issues" on page 18 for details.
Wisconsin tax benefits For the 2026 tax year	Wisconsin tax benefits related to the Tomorrow's Scholar® 529 Plan are available only to Wisconsin taxpayers. Contributors may reduce their Wisconsin taxable income with contributions made to an Account during the tax year, up to a maximum of \$5,280 per beneficiary for each tax year (adjusted annually for inflation). A married couple filing a joint return may reduce state taxable income with contributions, up to a maximum of \$5,280 per Beneficiary each year. A married couple filing separately may each claim a maximum deduction of \$2,640 per Beneficiary each year. Contributions exceeding the maximum deduction amount for the tax year may be carried forward to future tax years. Any amount withdrawn within 365 days of being contributed to the account must be added back to income or reduce available carry-over. Accrued earnings and Qualified Withdrawals are not subject to Wisconsin income tax. Employers that contribute to their employees' Wisconsin Trust accounts may be eligible for a Wisconsin state tax credit. Employers that may be eligible for the state tax credit include a sole proprietor, partner of a partnership, member of a limited liability company, or shareholder of a tax-option corporation that is an employer. Employers may receive a tax credit equal to 50% of the total contributions that the employer makes to a Wisconsin Trust account for its employee up to a maximum amount across all accounts of \$840 per employee per tax year. A state tax credit may only be claimed if the employee's compensation is reported, or required to be reported, on a W-2 form issued by the employer. Employers should consult a tax advisor regarding the availability and ramifications of this credit. See "Wisconsin state tax considerations" on page 18 for details.
Qualified Withdrawals	Use the Account to pay for Qualified Education Expenses of the Beneficiary at any Eligible Educational Institution, as well as to pay for certain expenses in connection with enrollment or attendance at, or for students enrolled at or attending, any elementary or secondary public, private or religious school, up to a maximum amount per taxable year per Beneficiary from all 529 Plans, and certain postsecondary credentialing expenses as defined in section 529(f) of the Code.. See "Qualified Withdrawals" on page 15 for details.
Investment Options	Account Owners can choose from among 32 Options, including 5 Static Allocation Options, 9 Age-Based Options, and 18 Single Fund Options including Options investing in Voya mutual funds and mutual funds managed by a variety of other managers. See "Investment Options" on page 8 for details.
Program expenses and fees	Account Owners bear the fees charged by the Tomorrow's Scholar® 529 Plan and the expenses of the Underlying Funds in which their selected Options invest. An Account Owner's financial intermediary may also charge fees in addition to the fees and expenses described in this Program Description. See "Fee Structure" on page 11 for details.
Program and investment risks	An investment in the Tomorrow's Scholar® 529 Plan is subject to investment risks, regardless of which Option(s) an Account Owner selects. An Account Owner may lose money, including any principal. In addition, Account Owners are

PROGRAM SUMMARY – EFFECTIVE JANUARY 1, 2026

	exposed to the risks of the Underlying Funds in which their selected Options invest. See “Tomorrow’s Scholar® 529 Plan Risks and Considerations” on page 19 and “Appendix C: Risks Applicable to the Investment Options” for details.
Investment performance	Account values vary based on Option performance. Past performance is not a guarantee of future results. Performance may be substantially affected over time by changes in an Option’s investment allocations and/or changes to an Option’s underlying investments. See “Appendix D: Investment Results” for details.
Changes in investment selection	An Account Owner may transfer funds between Options only twice per calendar year and upon a change in the Beneficiary to a Member of the Family of the current Beneficiary. See “Investment changes” on page 8 for details.
Contact information	<p>Regular Mail Tomorrow’s Scholar® 529 Plan c/o Voya Investment Management P.O. Box 534472 Pittsburgh, PA 15253-4472</p> <p>Overnight/Courier Tomorrow’s Scholar® 529 Plan <u>Attention: 534472</u> <u>500 Ross Street 154-0520</u> <u>Pittsburgh, PA 15262</u></p> <p>1-866-677-6933</p>

TABLE OF CONTENTS

Program Description Statement..... 1

Key Terms..... 2

Program Summary – Effective January 1, 2026 5

Introduction 9

Investment Options..... 9

Investment changes..... 9

Choosing a unit class..... 10

Class A units 10

Rights of accumulation..... 10

Sales charge waivers 11

Class AR units..... 11

Class C units 11

Class C1 units..... 11

Class W units..... 11

Compensation to dealers and servicing agents 12

Fee Structure 12

Annual asset-based fees 12

Service and transaction fees..... 13

Accounts opened through a financial intermediary 13

The Application Process 13

Personal information 13

UGMA/UTMA and other custodial accounts and trusts 13

Joint Account ownership..... 14

Designating a Successor Account Owner or Successor Custodian..... 14

Contributions 14

Minimum Contributions 14

Who may contribute 14

Methods of contribution 14

Contributions by check 14

AIP 14

Direct deposits from payroll 14

EFT 14

Qualified Rollover..... 15

Automated dollar cost averaging (“DCA”) program..... 15

Required information for certain contributions..... 15

Maximum contribution..... 15

Excess contributions..... 15

Contribution policies and fees..... 16

Ownership of contributions and earnings..... 16

Withdrawals..... 16

Qualified Withdrawals..... 16

Eligible Educational Institutions..... 16

K-12 Student Expenses..... 16

Postsecondary Credentialing Expenses..... 17

Qualified Education Expenses..... 17

Qualified Rollover..... 18

Non-Qualified Withdrawals 18

Distributions used to qualify for an American Opportunity Credit or Lifetime Learning Credit 18

Other withdrawals 18

Death of Beneficiary 18

Disability of Beneficiary 18

Receipt of scholarship 19

Residual account balances 19

Withdrawal Request Form 19

Signature guarantee 19

Changes to an Account 19

Change of Account Owner 19

Changing the Beneficiary..... 19

Tax Treatment..... 19

Taxation of 529 Plans generally..... 20

Federal taxation of contributions and withdrawals..... 20

Taxation of Rollovers..... 20

Refunds of Payments of Qualified Education Expenses.....	21
Federal gift and estate tax issues.....	21
Wisconsin state tax considerations	21
Coordination with other higher education expense benefit programs.....	22
Education savings accounts.....	22
American Opportunity Tax Credit (“AOTC”) and Lifetime Learning Credit.....	22
Tomorrow’s Scholar® 529 Plan Risks and Considerations	22
No guarantee of income or principal	22
Limited investment direction.....	23
Allocation methodology risk	23
Illiquidity	23
Limited Obligation.....	23
Potential program adjustments.....	23
Status of federal and state law and regulations governing the program	23
No indemnification.....	23
No guarantee of admittance	23
No guarantee that investments will cover education expenses.....	23
Suitability.....	23
Eligibility for financial aid.....	24
Creditor protection.....	24
Other Information	24
Investment policies.....	24
Statements and reporting	24
Electronic delivery of program documents.....	24
Householding	25
Continuing disclosure	25
Privacy: Important Notice	26
Types of information collected	26
Limitation on sharing of information.....	26
Security.....	26
Appendix A: Investment Options – Effective April 28, 2025	1
Appendix B: Allocations to Underlying Funds – Effective May 7, 2026	1
Appendix C: Risks Applicable to the Investment Options – Effective April 28, 2025	1
Appendix D: Investment Results – as of December 31, 2025.....	1
Appendix E: Total Estimated Annual Fees And Expenses – Effective May 7, 2026	1
Class A	1
Class C.....	2
Class C1.....	2
Class W	2
Appendix F: Approximate Cost of a \$10,000 Contribution – Effective May 7, 2026	1
APPENDIX G: FINANCIAL INTERMEDIARY – EFFECTIVE APRIL 1, 2026	1
APPENDIX H - Participation Agreement.....	1

INTRODUCTION

The Tomorrow's Scholar® 529 Plan is part of the Wisconsin College Savings Program created by 1995 Wisconsin Act 403, which was amended by 1999 Wisconsin Act 44, 2005 Wisconsin Act 479, 2011 Wisconsin Act 32, 2013 Wisconsin Act 227, 2017 Wisconsin Act 59, and 2017 Wisconsin Act 231 (the "Act"). It is intended to constitute a qualified tuition program under Section 529 of the Code.

The Tomorrow's Scholar® 529 Plan is designed as a savings vehicle for Qualified Education Expenses. Interests in the Tomorrow's Scholar® 529 Plan are municipal fund securities issued by the Trust. The Tomorrow's Scholar® 529 Plan is administered by the State.

The Board has administrative and oversight authority for the Tomorrow's Scholar® 529 Plan. The Board was established by the Act and consists of five ex officio members, including the secretary of the Department of Administration, the president of the Board of Regents of the University of Wisconsin System, the president of the Wisconsin Association of Independent Colleges and Universities, the chairperson of the State Investment Board, the president of the Wisconsin Technical College System Board, and six public members. The ex officio members may appoint designees to serve in their place. Except for the initial members, public members are appointed by the governor for four-year terms.

The Program Manager provides, directly or through affiliates and subcontractors, investment management, marketing, administration, and recordkeeping services for the Tomorrow's Scholar® 529 Plan. The Program Manager has designated the Transfer Agent to provide transfer agency and recordkeeping services for the Tomorrow's Scholar® 529 Plan. All references to the receipt or processing of transaction and maintenance requests throughout this Program Description refer, as applicable, to the receipt and processing of such requests by the Transfer Agent. Voya Investments Distributor, LLC is the primary distributor of interests in the Tomorrow's Scholar® 529 Plan.

In reliance on an exception provided by the federal securities laws, the Trust is not registered with the SEC as an investment company. In addition, interests in the Tomorrow's Scholar® 529 Plan are exempt from the registration requirements of the federal securities laws, although they are subject to regulation as "municipal fund securities." Neither the SEC nor any state securities commission has determined whether this Program Description is accurate or complete, nor made any determination as to whether anyone should purchase interests in the Tomorrow's Scholar® 529 Plan. Any representation to the contrary is a criminal offense.

INVESTMENT OPTIONS

An Account Owner may choose from the Age-Based, Static Allocation, and Single Fund Options described in "Appendix A: Investment Options." Contributions go toward purchasing units of the selected Option(s). In general, an Account Owner may select only one Option for an Account, except that an Account Owner may select multiple Single Fund Options for an Account.

The Tomorrow's Scholar® 529 Plan offers a variety of Options, each with a different investment objective, because investors have different investment needs, time horizons, and risk tolerances. The Age-Based and Static Allocation Options pursue their investment objectives through investments in multiple Underlying Funds. Each Single Fund Option pursues its investment objective through investment in a single Underlying Fund or, in one case, two Underlying Funds. The Options' target investment allocations among the Underlying Funds are included in "Appendix B: Allocations to Underlying Funds".

Ongoing monitoring of the Options and underlying investments is an important component of the Board's oversight role. The Board has a monitoring policy and procedures that allows it to take action if it is not satisfied with specific aspects of an Option's or underlying investment's performance and/or activities. These procedures are designed to take place in sequential order to provide ample information and feedback to the Board before any significant changes are implemented. Information on the policy or investments under review, if any, may be obtained by calling 1-866-677-6933. The Board may also hire new or additional program managers in the future to manage all or part of the Tomorrow's Scholar® 529 Plan's assets without the approval of Account Owners or Beneficiaries.

Account values vary based on Option performance and may be more or less than the amount an Account Owner invested. The investment performance of each Option is included in "Appendix D: Investment Results." **Past performance is not a guarantee of future results.** Performance may be substantially affected over time by changes in the Options' investment allocations and underlying investments. You could lose money (including any principal) if you invest in any of the Options. The Options are offered in accordance with the investment policy established by the Board. The Board reserves the right to change the investment policy for the Tomorrow's Scholar® 529 Plan at any time.

The Options, the investments held by the Options, and securities issued by the Tomorrow's Scholar® 529 Plan (for example, your investment in an Option) are not insured or guaranteed by the United States; the Federal Deposit Insurance Corporation; the State; the Board; any agency or instrumentality of the federal government or of the State; any underlying mutual funds or other issuers of investments held by the Options; TFI, the Program Manager, or any of their affiliates; any agent, representative, or subcontractor retained in connection with the Tomorrow's Scholar® 529 Plan; or any other person.

The Options and their underlying investments may be changed without the approval of Account Owners or Beneficiaries.

If an Account Owner selects an Age-Based Option, contributions are invested in the Age-Based Option corresponding to the actual or hypothetical age of the Beneficiary indicated on the Account Application or later provided to the Program Manager. The Age-Based Options are designed for college savings and may not be appropriate for K-12 time horizons. The Age-Based Options are comprised of separate age-bands designed for Beneficiaries of different ages. An Account for a younger Beneficiary will be invested in an Age-Based Option that primarily invests in equity Underlying Funds in order to seek to maximize return potential and to capitalize on the longer investment time frame. An Account for an older Beneficiary will be invested in an Age-Based Option that primarily invests in fixed income Underlying Funds in order to seek to preserve capital as the Beneficiary approaches college age. As the Beneficiary ages, the Account is automatically reinvested in the Age-Based Option corresponding to the age of the Beneficiary. These automatic reinvestments, when applicable, occur during August, except for certain Accounts established or held on an omnibus platform (please see Appendix G for more information). You have the flexibility to purchase an Age-Based Option based on your Beneficiary's actual age or a hypothetical age if you wish to be invested in a more aggressive or conservative age-band that have been designed for Beneficiaries of certain ages.

Investment changes

An Account Owner may transfer funds among Options only twice per calendar year and any time a change in the Beneficiary is made to a Member of the Family of the current Beneficiary. Transfer requests are processed based on the NAV per unit of the Options next calculated after receipt

of a transfer request in good form. Certain investment changes may be allowed via online Account access at www.tomorrowsscholar.com or by calling the Program Manager at 1-866-677-6933.

If an Account Owner in the Tomorrow's Scholar® 529 Plan owns multiple Trust accounts for the Beneficiary (including an account in Edvest), an investment selection change made on any individual account will be considered an annual investment change for all accounts. Investment changes made to multiple accounts on the same day constitute a single investment change.

For these purposes, the Tomorrow's Scholar® 529 Plan will treat a transfer of assets made directly between an Account in the Tomorrow's Scholar® 529 Plan and an account in another 529 Plan sponsored by the State for the same Beneficiary (including an account in Edvest) as a change in the Account Owner's Option selection subject to the rules described above.

Changing the age for the Beneficiary on an Account in an Age-Based Option may be considered an investment change.

CHOOSING A UNIT CLASS

Subject to eligibility, Account Owners may select from among Class A units, Class AR units, Class C units, Class C1 units, and Class W units. Each unit class has different sales charges and expenses. Determining which unit class is best for you will depend on the dollar amount you are investing and the age of the Beneficiary among other factors, including when you plan to withdraw assets from your Account. Based on your personal situation, your financial advisor can help you decide which unit class makes the most sense.

Units purchased with rollover contributions are subject to the same sales charges (if any), unless a specific financial intermediary waiver or discount applies, and the same fees and expenses as units purchased with other contributions.

Certain financial advisory firms may not make all unit classes available to you. Please contact your financial advisor to determine which unit class(es) it may make available to you. An Account Owner must designate a unit class on the Application. If no unit class is designated, Class A units, which are subject to an initial sales charge, will be automatically selected.

The Program Manager reserves the right to revise these fee arrangements at its discretion. Any revisions that increase the fees payable by an Account Owner must be approved by the Board.

Class A units

You can buy Class A units at NAV per unit plus any applicable initial sales charge, which is outlined in the table below. Out of the sales charge paid by an Account Owner, the Program Manager will pay to the applicable selling institution the commission also as shown in the table below. For purposes of determining sales charge, all Accounts in the Plan owned by the same Account Owner will be considered and the sales charge will be determined by aggregate assets held:

Purchase Amount	Initial Sales Charge	Selling Institution Commission
\$0 - \$99,999	3.50%	3.00%
\$100,000 - \$249,999	2.50%	2.00%
\$250,000 - \$499,999	1.75%	1.50%
\$500,000 - \$999,999	1.25%	1.00%
\$1,000,000 +	none	1.00%

The dollar amount of the applicable sales charge is the difference between the price of the units purchased and the NAV of those units. Because of rounding in the calculation of the offering price, the actual sales charge you pay may be more or less than that calculated using the percentages shown in the table above.

Class A units are also subject to an annual distribution and service fee of 0.25% of the class's average daily net assets, all of which compensates your financial advisor for providing ongoing services to you. For Class A units purchased in an amount of \$1,000,000 or more without a sales charge, if you sell (redeem) your units within 18 months of purchase, you will pay a CDSC of 1.00% of your original purchase price.

To take advantage of the lower sales charges on new purchases, an Account Owner may use the rights of accumulation. A financial advisor who wishes to exercise the rights of accumulation for an Account Owner must do so in writing at the time of the initial purchase or subsequent purchase.

Rights of accumulation

An Account Owner qualifies for cumulative quantity discounts on the purchase of Class A units when the Account Owner's new investment, combined with the current value of Class A units, Class AR units, Class C units, Class C1 units, and/or Class W units of any Option (excluding any Class A units not subject to an initial sales charge), reaches the discount level reflected in the applicable table above. The TIAA-CREF Principal Protection Option units acquired through reinvested dividends and distributions cannot be included in the total amount needed to qualify for a discount level. An Account Owner (or his or her financial advisor) must provide the Program Manager with written information to verify that a sales charge discount is applicable at the time of the investment, or any subsequent investment, is made. An Account Owner may also take into account the combined current value of Class A units, Class AR units, Class C units, Class C1 units, and/or Class W units in any Option (excluding Class A units not subject to an initial sales charge and TIAA-CREF Principal Protection Option units as outlined above) owned by a spouse or domestic partner, or by a child or grandchild if he or she is under the age of 21.

Examples of forms of ownership that may be taken into account when qualifying for sale charge discounts:

- Business accounts solely controlled by you and/or a member of your immediate family (for example, you own the entire business);
- Trust accounts established by you and/or a member of your immediate family. However, if the person(s) who established the trust is deceased, the trust account may be aggregated with accounts of the person who is the primary beneficiary of the trust;
- Individual purchases made by you and/or a member of your immediate family as a trustee if the investments are for a single trust estate;
- Endowments or foundations established and controlled by you and/or a member of your immediate family; and
- UGMA/UTMA accounts if you and/or a member of your immediate family is the beneficiary or custodian.

Sales charge waivers

The Board and/or the Program Manager may waive any fee if it is determined that circumstances warrant such waiver, and may revise or discontinue, in whole or in part, any fee waivers at any time without notice. To the extent that the annual distribution and service fee is waived, your financial advisor will not receive service fees as described in this section.

Class A units may be purchased without the initial sales charge if your financial advisor agrees to waive his or her commission. Such units are known as “load-waived” A units. Waiver of the initial sales charge is conditioned on the receipt of notice before you contribute, indicating that your financial advisor is waiving his or her commission. The initial sales charge for Class A units may also be waived if the purchase is made:

- By existing Account Owners currently investing in load-waived A units of the relevant Options;
- From proceeds of a redemption of Class A units of the same Option within 60 days of the date of redemption;
- By Account Owners formerly invested in the Wells Fargo Ultra Conservative Option who now are invested in the Voya 529 Ultra Conservative Option as a result of the transition to the new Tomorrow’s Scholar® 529 Plan. These Account Owners may make additional purchases of the Voya 529 Ultra Conservative Option without a sales charge;
- By Account Owners in group 529 Plans subject to certain requirements (contact the Program Manager for more details);
- By such other persons that are approved by the Board and/or the Program Manager;
- By employees of a registered broker-dealer who has an agreement with the Distributor; or
- By Account Owners who have affected a trustee-to-trustee Qualified Rollover of assets from Class A units of another 529 Plan to Class A units of the Tomorrow’s Scholar® 529 Plan through a financial intermediary that does not offer Class AR units.

In addition to the sales charge waivers above, additional sales load and CDSC waivers may be available through specific financial intermediaries. Please see Appendix G for further information.

Class AR units

Class AR units are generally designed for Account Owners who have affected a trustee-to-trustee Qualified Rollover of assets from Class A units of another 529 Plan.

A trustee-to-trustee Qualified Rollover is conditioned on the receipt of notice before you contribute, indicating that you are affecting such a Qualified Rollover from another 529 Plan.

Class AR units are subject to an annual distribution and service fee of 1.00% of the class’s average daily net assets which is used to reimburse the Program Manager for compensating your financial advisor. If you sell (redeem) your Class AR units within one year of purchase, you will pay a CDSC of 1.00% of your original purchase price.

Class AR units automatically convert to Class A units at the beginning of the second year of ownership, in the same month of the original purchase.

A CDSC is not assessed on Qualified Withdrawals or withdrawals made within one year of the death or permanent disability of the Beneficiary or due to receipt of a scholarship by the Beneficiary. To avoid being assessed a CDSC, you must submit satisfactory evidence of such death, permanent disability, or scholarship. In addition, the CDSC may be waived in connection with certain Account closings and distributions initiated by the Board and/or the Program Manager as described in this Program Description.

Class C units

You can buy Class C units at NAV per unit without an initial sales charge. Class C units are subject to an annual distribution and service fee of 1.00% of the applicable Option’s average daily net assets. The 1.00% fee is comprised of an annual 0.25% service fee and an annual 0.75% asset-based sales charge designed to compensate your financial advisor. If you sell (redeem) your Class C units within one year of purchase, you will have to pay a CDSC of 1.00% of your original purchase price.

Class C units automatically convert to Class A units at the beginning of the sixth year of ownership, in the same month of the original purchase. On February 1, 2021, any Class C unit that has been held for more than five years will immediately convert to Class A units.

A CDSC is not assessed on Qualified Withdrawals or withdrawals made within one year of the death or permanent disability of the Beneficiary or due to receipt of a scholarship by the Beneficiary. To avoid being assessed a CDSC, you must submit satisfactory evidence of such death, permanent disability, or scholarship. In addition, the CDSC may be waived in connection with certain Account closings and distributions initiated by the Board or the Program Manager as described in this Program Description.

Class C1 units

Class C1 units are available only for TIAA-CREF Options (with the exception of the TIAA-CREF Principal Protection Option). You can buy Class C1 units at NAV per unit without an initial sales charge. Class C1 units are subject to an annual distribution and service fee of 0.50% of the class’s average daily net assets. The 0.50% fee is comprised of an annual 0.25% service fee and an annual 0.25% asset-based sales charge designed to compensate your financial advisor. If you sell (redeem) your Class C1 units within one year of purchase, you will have to pay a CDSC of 0.50% of your original purchase price.

A CDSC is not assessed on Qualified Withdrawals or withdrawals made within one year of the death or permanent disability of the Beneficiary or due to receipt of a scholarship by the Beneficiary. To avoid being assessed a CDSC, you must submit satisfactory evidence of such death, permanent disability, or scholarship. In addition, the CDSC may be waived in connection with certain Account closings and distributions initiated by the Board or the Program Manager as described in this Program Description.

Class W units

Class W units are generally designed for qualified registered investment advisers who buy through a broker/dealer or service agent who has entered into an agreement with the Distributor that allows for Class W unit purchases. Class W units are not subject to annual distribution and service fees or initial sales charges. Your financial advisor will not receive any distribution, service fees, or commissions from Class W units of the Options.

In addition to the use by qualified registered investment advisers, Class W units may be purchased by:

- Any current or retired officer, director, trustee, or employee (or member of their immediate family) of TFI, the Program Manager or one of its affiliates;
- Employees (or a member of their immediate family) of the investment managers of the underlying investments and mutual funds, the firms that have executed a selling agreement for the Tomorrow's Scholar® 529 Plan with the Distributor, or the Tomorrow's Scholar® 529 Plan's Transfer Agent; or
- Such other persons that are approved by the Board and/or the Program Manager.

Compensation to dealers and servicing agents

In addition to dealer reallowances and payments made by each Option for distribution and account owner servicing, the Program Manager, the Distributor, or their affiliates make additional payments ("Additional Payments") to certain selling or account owner servicing agents for the Option, which include broker/dealers. These Additional Payments are made in connection with the sale and distribution of units of the Option or for services to the Option and its Account Owners. These Additional Payments, which may be significant, are paid by the Program Manager, the Distributor, or their affiliates out of their revenues.

In return for these Additional Payments, the Program Manager and the Distributor expect to receive certain marketing or servicing advantages that are not generally available to mutual funds or 529 Plans that do not make such payments. Such advantages are expected to include, without limitation, placement of the Option on a list of mutual funds or 529 Plans offered as investment options to the selling agent's clients (sometimes referred to as "shelf space"), access to the selling agent's registered representatives, and/or ability to assist in training and educating the selling agent's registered representatives.

Certain selling or account owner servicing agents receive these Additional Payments to supplement amounts payable by the Option under the account owner servicing plans. In exchange, these agents provide services including, but not limited to, establishing and maintaining accounts and records; answering inquiries regarding purchases, exchanges, and redemptions; processing and verifying purchase, redemption, and exchange transactions; furnishing account statements and confirmations of transactions; processing and mailing monthly statements, 529 Plan program descriptions or other plan offering documents, account owner reports, and other SEC- or MSRB-required communications; and providing the types of services that might typically be provided by a transfer agent (for example, the maintenance of omnibus or omnibus-like accounts, the use of the National Securities Clearing Corporation for the transmission of transaction information and the transmission of account owner mailings).

The Additional Payments may create potential conflicts of interest between an investor and a selling agent who is recommending a particular 529 Plan, such as the Tomorrow's Scholar® 529 Plan, or a particular Option of the Tomorrow's Scholar® 529 Plan, over other 529 Plans or investment options. Before investing, you should speak with your financial advisor and review carefully any disclosure by the selling agent as to what monies the financial advisor receives from 529 Plan advisors and distributors, as well as how your financial advisor is compensated.

The Additional Payments are typically paid in fixed dollar amounts or based on the number of customer accounts maintained by the selling or account owner servicing agent or based on a percentage of sales and/or assets under management or a combination of the above. The Additional Payments are either up-front or ongoing or both. The Additional Payments differ among selling and account owner servicing agents.

The Program Manager may receive from each of the Underlying Funds, or the Underlying Funds' affiliates, compensation the amount and type of which may vary with respect to each of the Underlying Funds. This revenue is one of several factors the Program Manager may consider when recommending Underlying Funds for the Tomorrow's Scholar® 529 Plan.

FEE STRUCTURE

Account Owners bear the fees charged by the Tomorrow's Scholar® 529 Plan and also indirectly bear the costs of investing in the Underlying Funds. These expenses will reduce the value of an Account. The Tomorrow's Scholar® 529 Plan expenses and fees are subject to change at any time. Potential reasons for a fee change include, but are not limited to, changes in the total fees associated with the Underlying Funds due to an increase or decrease in other expenses or management fees, or the addition of other fees; the State's revenue from the administration fee is more or less than needed to cover its annual administrative expenses; or mutual agreement by the Board and the Program Manager to increase the administration fee paid to the Program Manager to cover unanticipated, increased costs to administer the Tomorrow's Scholar® 529 Plan. In addition, the loads and fees paid on Accounts opened through a financial advisor may change as needed to keep pace with the market. All fee changes must be approved by the Board. The Board and/or the Program Manager may waive any fee if it is determined that circumstances warrant such waiver.

These fees and expenses are described in "Appendix E: Total Estimated Annual Fees and Expenses" and "Appendix F: Approximate Cost of a \$10,000 Contribution".

Annual asset-based fees

Each Option is subject to an annual asset-based fee. This is an ongoing fee calculated at an annualized rate based on the average daily net assets of the Option. The annual asset-based fee for each Option is made up of different components consisting of the expenses of its Underlying Fund(s) as discussed further below, a program manager administration and management fee payable to the Program Manager (the "Program Manager Fee"); and an administrative fee payable to the Board (the "Board Fee"), which is used by the State to offset costs of administering and promoting the Tomorrow's Scholar® 529 Plan or for other expenses the Board deems appropriate in connection with the Tomorrow's Scholar® 529 Plan. The Board or the Program Manager may, from time to time, voluntarily agree to waive fees. Voluntary waivers may be modified or terminated at any time. The amount charged to your Account for the Board Fee may be dependent upon the Option you choose.

Annual asset-based fees for Accounts in the Age-Based Options will vary based upon the Option in which the Account is invested. The applicable Option differs based upon the number of years until the Beneficiary enrolls in higher education. During each period in which an Account is invested in a particular Option, the annual asset-based fees for that Option would apply.

Each Option bears a pro rata share of the expenses of the Underlying Fund(s) in which it invests. Estimated Underlying Fund expenses are based on the weighted average of each Underlying Fund's net expense ratio, as reported in the Underlying Fund's prospectus in effect at the time this Program Description was prepared. The amount of the Underlying Fund expense borne by an Option is based on the Option's investment allocation to the Underlying Fund held and the expense ratio of that Underlying Fund.

The Board has engaged an independent auditor to perform an annual audit of the Trust, including the Tomorrow's Scholar® 529 Plan and the Edvest College Savings Plan. Expenses related to the audit are estimated and may be charged against all Options at a flat rate, which is determined based on current asset levels across the Trust.

The fees for all Options are computed daily using average daily net assets and are payable monthly.

Service and transaction fees

An annual maintenance fee of \$25, payable to the Program Manager, may be charged to all Accounts that do not qualify for a fee waiver. The fee is paid in arrears on a date agreed to by the Board and the Program Manager (currently in December) and is non-refundable. The annual fee will be waived for Accounts for which either the Account Owner or the Beneficiary is a Wisconsin resident based on the address of record. The annual fee will also be waived, regardless of residency in the following circumstances: (1) if the Account balance is greater than \$25,000; (2) if there is an AIP or payroll direct deposit of \$25 per month in each Option selected for investment (active for the 12 previous months without interruption); (3) for Accounts established by employees of the Program Manager and its affiliates; (4) for Accounts invested in Class AR units; or (5) for certain Accounts established or held on an omnibus platform. Should you withdraw your entire Account prior to the annual fee being paid; the fee will be deducted at the time of withdrawal.

Accounts opened through a financial intermediary

Accounts opened through financial advisors may have additional fees and features. The Program Manager and/or your financial advisor may, at their discretion, choose to waive certain fees that they receive, as described in "Choosing a Unit Class". Your financial advisor can help you determine which unit class is best for you.

THE APPLICATION PROCESS

To participate in the Tomorrow's Scholar® 529 Plan, each prospective Account Owner (including any joint Account Owners) must be either an individual of legal age, an individual's legal representative, a trust, an estate, or an organization described in Section 501(c)(3) of the Code and exempt from taxation under Section 501(a) of the Code with the authority to open an Account for the Beneficiary, or a qualified custodian under the UGMA/UTMA. The prospective Account Owner must complete and sign an Account application. At the time of enrollment, the Account Owner must designate a Beneficiary for the Account. (Certain exceptions apply for eligible scholarship programs. Call Voya at 1-866-677-6933 for more information.) There may be only one Beneficiary per Account. The Beneficiary is not required to be related to the Account Owner. An Account Owner may have multiple Accounts for the same or different Beneficiaries. An Account Owner may name a successor Account Owner to assume control of the Account in the event of the original Account Owner's death. A valid Social Security number (or taxpayer identification number) must be provided for the Account Owners, any successor Account Owner, and the Beneficiary.

At the time of enrollment, the Account Owner must provide an Option selection for the Account (see "Investment changes"). The Account Owner maintains control over the Account and is responsible for directing investments, whether contributed by the Account Owner or by another person, and withdrawals to the extent permitted by law. The Beneficiary has no control over the assets of the Account and may not direct withdrawals from the Account.

The custodian for a minor under a state's UGMA or UTMA may open an Account that is subject to additional limitations, such as the inability to change the Beneficiary and certain restrictions on withdrawals (see "UGMA/UTMA and other custodial accounts and trusts"). A custodian should consult his or her tax advisor for additional information concerning these restrictions before opening an Account.

Personal information

The Program Manager acts in accordance with a customer identification program and obtains certain personal information from the Account Owner in order to verify the Account Owner's identity. If the Account Owner does not provide the following information as requested on the Account application—full name, date of birth (if applicable), Social Security number or taxpayer identification number, and street address—the Program Manager may refuse to open the Account. If reasonable efforts to verify this information are unsuccessful, the Program Manager may take certain actions on the Account without prior notice to the Account Owner, including rejecting contribution requests, suspending Account services, or closing the Account. Option units redeemed as a result of closing an Account will be valued at the NAVs per Unit next calculated after the Program Manager decides to close the Account and the risk of market loss and any tax implications as a result of the liquidation will be the Account Owner's responsibility.

Personal and financial information pertaining to Account Owners and Beneficiaries is not available to the public. However, financial advisors through which Account Owners may invest may have their own policies regarding confidentiality of this information.

UGMA/UTMA and other custodial accounts and trusts

The custodian of an Account established or being opened under a state's UGMA or UTMA may open an Account in his or her custodial capacity. These types of Accounts involve additional restrictions that do not apply to regular Accounts. A custodian who uses UGMA/UTMA funds to establish an Account must indicate that the Account is custodial by checking the appropriate box on the Account application. Neither the Program Manager, the Underlying Funds, the Board, the State, nor the Tomorrow's Scholar® 529 Plan will be liable for any consequences related to a custodian's improper use, transfer, or characterization of custodial funds. A UGMA/UTMA custodian must establish an Account in his or her custodial capacity separate from any Accounts he or she may hold in his or her individual capacity in order to contribute UGMA/UTMA assets. In general, UGMA/UTMA custodial Accounts are subject to the following additional requirements and restrictions:

- The custodian will not be able to change the Beneficiary of the Account;
- The custodian will not be permitted to change the Account Owner to anyone other than a successor custodian during the term of the custodial Account under applicable UGMA/UTMA law; and
- The custodian must notify the Program Manager when the custodianship terminates and the Beneficiary is legally entitled to take control of the Account. At that time, the Beneficiary will become the Account Owner and will become subject to the provisions of the Tomorrow's Scholar® 529 Plan applicable to non-UGMA/UTMA Account Owners. Also, custodians or designated beneficiaries will need to complete certain forms at that time to document the termination of the custodianship.

In addition, certain tax consequences described herein may differ in the case of Accounts opened by a custodian under applicable UGMA/UTMA law.

Joint Account ownership

Joint Account ownership is available. The name and Social Security number of the primary Account Owner will be used for IRS reporting purposes. Each Account Owner should consult a tax advisor regarding the proper treatment of any IRS reporting made by the Tomorrow's Scholar® 529 Plan. Account statements, transaction confirmations, and Disclosure Statements and supplements, as well as correspondence from the Tomorrow's Scholar® 529 Plan will be mailed to the address on file for the primary Account Owner. You can choose to have duplicate account statements sent to the joint Account Owner at another address, as an interested party, by completing the appropriate form.

Designating a Successor Account Owner or Successor Custodian

The Account Owner of an Individual 529 Account or Custodian of an UTMA/UGMA Account may designate a Successor to take control of the Account in the event of the Account Owner's/Custodian's death. The Successor Owner/Successor Custodian will have all the powers of an Account Owner/Custodian upon the Account Owner's/Custodian's death with the submission of the Transfer Due to Death form and the appropriate documents. The Successor must be an individual residing in the U.S. with a valid Social Security number or Taxpayer Identification number, who is at least 18 years of age or Trust (Foreign Trusts are not eligible), at the time the account is transferred and when a contribution is made to the account. The Successor is not considered a joint account owner and cannot take any action on the Account prior to the Account Owner's/Custodian's death. An Account Owner/Custodian may designate a Successor Owner/Successor Custodian by completing the appropriate section of the Tomorrow's Scholar® 529 Account Application. An Account Owner may also add, change, or revoke a Successor Owner/Successor Custodian at any time.

All transfers due to death require a new account to be established for the beneficiary/minor before a transfer can take place. Please contact Voya at 1-866-677-6933, Monday through Friday from 7 a.m. – 5 p.m. CT for more information.

CONTRIBUTIONS

Minimum Contributions

Except as otherwise noted, the minimum initial contribution to the Tomorrow's Scholar® 529 Plan is \$250 for each Option in which the contribution is invested. The minimum subsequent contribution is \$25 for each Option in which the contribution is invested. Please note that the minimum initial contribution is waived for Accounts opened with an AIP or payroll direct deposit.

The Distributor has the right to waive initial investment minimums at any time.

Who may contribute

Anyone (including your friends and family) may make a contribution to your Account. However, there may be gift or other adverse tax consequences to the contributor and/or the Account Owner. A person, other than the Account Owner, who contributes to an Account, will not retain any rights with respect to such contribution. For example, only the Account Owner may give investment instructions for contributions or request withdrawals from the Account.

Methods of contribution

Contributions may only be made by check, AIP, payroll direct deposit (including government allotments), EFT, or federal wire. The Tomorrow's Scholar® 529 Plan does not accept cash, checks drawn on banks outside the United States, starter checks, or credit card checks and may elect not to accept third-party checks. No securities will be accepted as contributions.

Contributions by check

An Account Owner making an initial contribution by check or money order must send an initial minimum contribution of \$250 with his or her Account application. The check must be made payable to "Tomorrow's Scholar." There is currently no restriction on who may contribute to an Account.

AIP

The Account Owner may authorize the Tomorrow's Scholar® 529 Plan to perform periodic automated debits from a checking or savings account at another financial institution to contribute to his or her Account. To initiate an AIP, the Account Owner must: (1) complete the AIP section of the Account application and submit a voided check or savings account deposit slip; (2) submit an Account Change Request form and a voided check or savings account information after the Account has been established; or (3) make a change to an AIP via online access at www.tomorrowsscholar.com. Automated contributions must be at least \$25 for each Option in which the contribution is invested. An authorization to perform automated periodic contributions will remain in effect until the Tomorrow's Scholar® 529 Plan has received notification of its termination. The Account Owner or the Tomorrow's Scholar® 529 Plan may terminate the AIP at any time. Requests for changes to, or termination of, an AIP must be received at least two business days before the day of the month that the AIP is regularly scheduled to occur. There is no charge for establishing an AIP.

Direct deposits from payroll

An Account Owner may be eligible to make automatic, periodic contributions to his or her Account by payroll direct deposit, including direct deposit from government allotments (for example, Social Security or the military). The minimum initial and subsequent payroll direct deposit contribution is \$25 for each Option in which the contribution is invested. Contributions by payroll direct deposit will only be permitted from employers able to meet the Transfer Agent's operational and administrative requirements for 529 Plan payroll contributions, including those employers offering a group 529 Plan. In order to enroll in the Tomorrow's Scholar® 529 Plan via direct deposits (payroll deduction), please forward the Payroll/Direct Deposit Authorization Form, which can be downloaded at www.tomorrowsscholar.com.

EFT

The Account Owner may authorize the Tomorrow's Scholar® 529 Plan to withdraw funds by EFT from a checking or savings account by calling a Tomorrow's Scholar® 529 Plan representative at 1-866-677-6933 or by using the online Account access services at www.tomorrowsscholar.com. To establish the EFT option, an Account Owner must either: (1) select it on the new Account application and submit a voided check or savings account information; or (2) submit an Account Change Request form and a voided check or savings account information after the Account has been established.

Qualified Rollover

Qualified Rollover contributions to an Account must be accompanied by the appropriate form, as well as any other information required by the Tomorrow's Scholar® 529 Plan (see "Required information upon certain contributions"). In general, Qualified Rollovers must be made by direct transfer from an account in another 529 Plan or by a withdrawal of funds from an account in another 529 Plan followed within 60 days of that withdrawal by a contribution of those funds, in either case, into an Account for: (i) the same Beneficiary; or (ii) a Beneficiary who is a Member of the Family of the beneficiary for the distribution account. A Qualified Rollover for the benefit of the same Beneficiary may be made if it has been at least 12 months since a previous Qualified Rollover for that Beneficiary. In other cases, the withdrawal may be considered a Non-Qualified Withdrawal subject to all applicable federal and state and/or local income taxes, including the additional 10% federal tax, on earnings. Such transfer will be permitted only to the extent that the aggregate balance of all accounts under the Trust for the Beneficiary, including the amount of such transfer, would not exceed the maximum contribution limit.

For information regarding transfers between 529 Plans sponsored by the State, see "Investment changes".

A Qualified Rollover from an existing class A share in another 529 Plan is eligible for a Qualified Rollover contribution to Class AR units of an Option. If a Qualified Rollover contribution of at least \$25,000 is made to the Tomorrow's Scholar® 529 Plan from another state's 529 Plan and a Qualified Rollover fee is charged, the Distributor will reimburse the Qualified Rollover fee charged (up to \$75 per Qualified Rollover) by the previous 529 Plan. The Distributor will not reimburse the Account for other charges imposed, such as CDSC, finder's fees, or annual account charges. The amount of the reimbursement will be credited to the Account into which the Qualified Rollover contribution is made and the reimbursement will be treated as a contribution by the Account Owner to the Account. You may wish to consult your tax advisor regarding any potential tax implications related to such reimbursement. In order to receive the reimbursement, a copy of a statement showing the fee must be provided to the Distributor.

Units purchased with rollover contributions are subject to the same sales charges (if any), unless a specific financial intermediary waiver or discount applies, and the same fees and expenses as units purchased with other contributions.

The Distributor reserves the right to discontinue the reimbursement program at any time.

Automated dollar cost averaging ("DCA") program

By selecting the DCA program, the Account Owner may make a lump sum contribution to the TIAA-CREF Principal Protection Option and, at the time of the lump sum contribution, designate automatic contributions on a monthly, quarterly, semi-annual, or annual basis to other Options offered by the Tomorrow's Scholar® 529 Plan. To enroll in this program, your total initial contribution to the TIAA-CREF Principal Protection Option must be at least \$5,000, and the amount of your automatic contribution must be at least \$500 per Account. These automatic contributions are not considered reallocations for purposes of the twice per calendar year limitation on investment reallocations generally, if specified at the time the lump sum contribution is made. Stopping or changing the automatic contribution instructions with respect to prior contributions still remaining in the TIAA-CREF Principal Protection Option will constitute a reallocation for purposes of the twice per calendar year limitation (see "Investment changes"). The automatic contributions will be made on a date selected by the Account Owner or if such day is not a business day, on the next succeeding business day and will continue until the investment in the TIAA-CREF Principal Protection Option is depleted or the automatic contribution instructions are otherwise terminated.

Since the DCA program involves regular transfers from the TIAA-CREF Principal Protection Option regardless of fluctuating price levels of its Underlying Fund and resulting fluctuation of the Option's NAV, Account Owners should consider their financial ability to continue to invest the automatic contributions in other Options through period of declining price levels.

Required information for certain contributions

When making a contribution to the Tomorrow's Scholar® 529 Plan using assets previously invested in a Coverdell Education Savings Account ("ESA"), a qualified U.S. savings bond, or another 529 Plan, the contributor must indicate the source of the contribution and provide the Program Manager with the following documentation, as applicable:

- In the case of a contribution from an ESA, an account statement issued by the financial institution that acted as custodian of the ESA that shows basis and earnings in the ESA.
- In the case of a contribution from the redemption of a qualified U.S. Savings Bond, an account statement or Form 1099-INT issued by the financial institution that redeemed the bond showing interest from the redemption of the bond.
- In the case of a Qualified Rollover contribution from another 529 Plan, a statement issued by the distributing program that shows the earnings portion of the distribution. In the case of any direct transfer between 529 Plans, the distributing program must provide the Tomorrow's Scholar® 529 Plan a statement that sets forth this information.

Until the Tomorrow's Scholar® 529 Plan receives the documentation described above, as applicable, the Tomorrow's Scholar® 529 Plan will treat the entire amount of the contribution as earnings.

Maximum contribution

Contributions to an Account will not be permitted to the extent that the contribution would cause the aggregate balance of all Trust accounts for the same Beneficiary to exceed the maximum contribution limit. The maximum contribution limit is based on the aggregate value of the account(s) in the Trust for a Beneficiary at the time of contribution, not on the aggregate contributions made to such accounts. Accounts that have reached the maximum contribution limit may continue to increase in value due to market fluctuation. For the current maximum contribution limit, please refer to the "Program Summary."

Pursuant to Section 529 of the Code, the Board is required to set the maximum contribution limit for all Trust accounts for a designated beneficiary. The Board expects to evaluate the maximum contribution limit annually but reserves the right to make adjustments more or less frequently. Information concerning the current maximum contribution limit may be obtained through the Program Manager. It is possible that federal law might impose different limits on maximum contributions in the future.

Excess contributions

The Tomorrow's Scholar® 529 Plan will not accept any contribution to the extent that the maximum contribution limit is exceeded or to the extent that the contribution causes the maximum contribution limit to be exceeded. Excess contributions will be returned to the contributor.

Contribution policies and fees

Following receipt of any contributions, the Tomorrow's Scholar® 529 Plan reserves the right, subject to applicable law, not to allow withdrawals of those contributions (or their equivalent) for up to seven calendar days. The Program Manager may impose a fee on any check, AIP investment, or telephone purchase via EFT returned unpaid by the financial institution upon which it is drawn, which may be deducted from the Account. See "Service and transaction fees".

A confirmation statement that verifies the amount of a contribution and a description of the Option(s) in which units were purchased will be provided to the Account Owner following each transaction (except for AIP and dividend reinvestments). If an error has been made in the amount of the contribution or the Option used is not what the Account Owner selected on the Account application, the Account Owner has 60 days from the date of the statement to notify the Program Manager of the error.

The Program Manager uses reasonable procedures to confirm that transaction requests are genuine. The Program Manager may be responsible if it does not follow these procedures. The Account Owner may be responsible for losses resulting from fraudulent or unauthorized instructions received by the Program Manager, provided that the Program Manager reasonably believes the instructions were genuine. To safeguard your Account, please keep your information confidential. Contact the Program Manager immediately if you believe that there is a discrepancy between a transaction you performed and the confirmation statement you received, or if you believe that someone has obtained unauthorized access to your Account.

A contribution may be refused or rejected, in whole or in part, if it appears to be an abuse of the Tomorrow's Scholar® 529 Plan.

Contributions to an Option are invested in accordance with the investment policy established by the Board. The Board reserves the right to change the investment policy for the Tomorrow's Scholar® 529 Plan at any time.

Ownership of contributions and earnings

Although contributions to an Account can be made by anyone, the Account Owner retains ownership and control of all contributions, as well as all earnings credited to the Account up to the date they are directed for disbursement. A Beneficiary or contributor who is not the Account Owner has no control over any of the Account assets.

WITHDRAWALS

An Account Owner may make withdrawals from his or her Account at any time. An Account Owner may also terminate his or her participation in the Tomorrow's Scholar® 529 Plan at any time, although in such event under federal law, the earnings portion of Non-Qualified Withdrawals may be subject to an additional 10% federal tax on earnings, in addition to any applicable federal or state and/or local income taxes that may otherwise be due (see "Tax Treatment"). In the event of a withdrawal or termination, the withdrawal is effected at the NAV per unit next calculated after the Tomorrow's Scholar® 529 Plan's receipt and the acceptance of a properly completed request. See "Tax Treatment – Federal taxation on contributions and withdrawals" for details.

Account Owners are responsible for making the determination as to whether a withdrawal is a Qualified Withdrawal or a Non-Qualified Withdrawal and for including this information on the Withdrawal Request Form. As part of this determination, Account Owners are responsible for monitoring and complying with the aggregate limit per tax year applicable to withdrawals used to pay for tuition in connection with enrollment or attendance at K-12 Institutions and the applicable lifetime limit applicable to withdrawals used for the payment of qualified education loans. If an Account Owner indicates on the Withdrawal Request Form that a withdrawal is a Qualified Withdrawal, such a withdrawal may be paid:

- Directly to an Eligible Educational Institution
- Directly to a K-12 institution
- Directly to the Account Owner
- Directly to a Beneficiary for Qualified Education Expenses for an Eligible Educational Institution

Qualified Withdrawals

In general, a Qualified Withdrawal is any distribution that is used to pay for the Qualified Education Expenses of a Beneficiary incurred in the same tax year as the withdrawal or potentially in a prior or future tax year. If an Account Owner indicates on the Withdrawal Request Form that a withdrawal is a Non-Qualified Withdrawal, that withdrawal may only be paid to the Account Owner or the Beneficiary. The distributee or recipient of any withdrawal, not the Tomorrow's Scholar® 529 Plan, is responsible for determining whether the withdrawal is a Qualified Withdrawal or Non-Qualified Withdrawal for tax purposes.

State tax treatment of withdrawals for K-12 tuition expenses, apprenticeship expenses, and payment of qualified education loans is determined by the state where you file state income tax. Please consult with a tax advisor before withdrawing funds for any such expenses.

Eligible Educational Institutions

Generally, Eligible Educational Institutions include accredited postsecondary education institutions in the United States and certain institutions abroad that offer credit toward an associate's degree, a bachelor's degree, a graduate-level or professional degree, or another recognized postsecondary credential and certain postsecondary vocational and proprietary institutions. Such Eligible Educational Institutions must be eligible to participate in U.S. Department of Education student financial aid programs.

K-12 Student Expenses

For federal and Wisconsin tax purposes, Qualified Education Expenses include the following expenses in connection with enrollment or attendance at, or for students enrolled at or attending, any elementary or secondary public, private or religious school described in section 529(c)(7) of the Code:

- Tuition;
- Curriculum and curricular materials;
- Books or other instructional materials;

- Online education materials;
- Tuition for tutoring or educational classes outside of the home, including at a tutoring facility, but only if the tutor or instructor is not related to the student and:
 - Is licensed as a teacher in any State;
 - Has taught at an eligible educational institution, or
 - Is a subject matter expert in the relevant subject;
- Fees for a nationally standardized norm-referenced achievement test, an advanced placement examination, or any examinations related to college or university admission;
- Fees for dual enrollment in an institution of higher education; and
- Educational therapies for students with disabilities provide by a licensed or accredited practitioner or provider, including occupational, behavioral, physical, and speech-language therapies.

For the yearly maximum amount, please refer to the “Program Summary.” The state tax treatment of withdrawals used to pay for elementary and secondary school expenses is determined by the state where you file state income taxes and may differ from federal tax treatment. Participants are responsible for monitoring and complying with the maximum aggregate limit with respect to K-12 student expenses withdrawals.

Postsecondary Credentialing Expenses

An account owner is permitted to use funds from a 529 Account for certain postsecondary credentialing expenses, as follows:

- Tuition, fees, books, supplies, and equipment required for the enrollment or attendance of a beneficiary in a Recognized Postsecondary Credential Program, or any other expense incurred in connection with enrollment in or attendance at a Recognized Postsecondary Credential Program if the expense would, if incurred in connection with enrollment or attendance at an Eligible Education Institution, be covered under section 529(e)(3)(A) of the Code.
- Fees for testing if such testing if required to obtain or maintain a Recognized Postsecondary Credential, and
- Fees for continuing education if such education is required to maintain a Recognized Postsecondary Credential.

The term *Recognized Postsecondary Credential* means:

1. A Credential that is industry-recognized and is
 - Any postsecondary employment credential issued by a program that is accredited by the Institute for Credentialing Excellence, the National Commission on Certifying Agencies, or the American National Standards Institute
 - Any postsecondary employment credential that is included in the Credentialing Opportunities On-Line (COOL) directory of credentialing programs maintained by the Department of Defense or by any branch of the Armed Forces
 - Any postsecondary employment credential identified by the Secretary of the Treasury, after consultation with the Secretary of Labor, as being industry recognized
2. Any certificate of completion of an Apprenticeship Program
3. Any occupational or professional license issued or recognized by a state or the federal government and any certification that satisfies a condition for obtaining the license
4. Any recognized postsecondary credential as defined in section 3(52) of the Workforce Innovation and Opportunity Act (WIOA) provided through a WIOA Recognized Postsecondary Credential Program. Section 3(52) defines a recognized postsecondary credential as “a credential consisting of any industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or federal government, or an associate or baccalaureate degree.”

The term *Recognized Postsecondary Credential Program* means any program to obtain a Recognized Postsecondary Credential, if one or more of the following statements apply:

- The program is on a state list prepared under Section 122(d) of the Workforce Innovation and Opportunity Act (WIOA). Each state provides its own list of programs designed to comply with WIOA. For example, you can find a list of eligible training providers for Wisconsin at Workforce Innovation and Opportunity Act | Department of Workforce Development.
- The program is listed in the public directory of the Web Enabled Approval Management System (WEAMS) of the Veterans Benefits Administration. You can find more information about these programs at <https://inquiry.vba.va.gov/weamspub/buildSearchInstitutionCriteria.do>.
- An examination is required to obtain or maintain a credential, and the exam is developed or administered by an organization widely recognized as providing reputable credentials in the occupation the exam relates to. The organization must also recognize the program as providing training or education that prepares the individual to take the exam.
- The program is identified by the Secretary of the Treasury, after consultation with the Secretary of Labor, as being a reputable program for obtaining a Recognized Postsecondary Credential.

Education Loan Repayments: Amounts paid as principal or interest on any qualified education loan of either the Beneficiary, or a sibling of the Designated Beneficiary, up to a lifetime limit of \$10,000 per individual. Distributions treated as Qualified Higher Education Expenses with respect to the loans of a sibling of a Designated Beneficiary will count towards the limit of the sibling, not the Designated Beneficiary. Such loan repayments may impact student loan interest deductibility.

Qualified Education Expenses

Qualified Education Expenses related to an Eligible Educational Institution must be incurred by the Beneficiary during any of the years the Beneficiary is enrolled at an Eligible Educational Institution. To qualify as a Qualified Education Expense, the cost of room and board must be incurred during an academic period during which the Beneficiary is enrolled or accepted for enrollment in a degree, certificate or other program that leads to a recognized educational credential awarded by an Eligible Educational Institution while attending at least half-time. The limit for annual room and board expenses for off-campus housing is the allowance included in the “cost of attendance” (for purposes of determining eligibility for federal educational assistance for that year) at the Eligible Educational Institution, or if greater, the actual amount charged by the Eligible Educational Institution for room and board costs for the applicable period.

For federal and Wisconsin tax purposes, any reference to Qualified Education Expenses also includes: (i) Apprenticeship Expenses; (ii) amounts paid as principal or interest on any qualified education loan of either the Beneficiary or a sibling of the Beneficiary, up to a lifetime limit of \$10,000 per individual; and (iii) certain postsecondary credentialing expenses as defined in section 529(f) of the Code. Distributions treated as Qualified Education Expenses with respect to the loans of a sibling of a Beneficiary will count towards the limit of the sibling, not the Beneficiary. Loan Repayments may impact student loan interest deductibility. Participants will be responsible for tracking their Loan Repayments in accordance with the \$10,000 per individual limit.

State tax treatment of withdrawals for Qualified Education Expenses, including those for K-12 student expenses, Registered apprenticeship expenses, certain postsecondary credentialing expenses, and payment of qualified education loans is determined by the state where you file state income tax. Please consult with a tax advisor before withdrawing funds for any such expenses.

Qualified Rollover

An Account Owner may roll over all or part of the balance of an Account as a Qualified Rollover so long as the amount is placed within 60 days of the withdrawal in or is directly transferred: (1) to another 529 Plan for the benefit of the same beneficiary, provided that it has been at least 12 months from the date of the previous transfer to a 529 Plan for that beneficiary; (2) to the credit of another beneficiary under a 529 Plan who is a Member of the Family of the Beneficiary of the Account with respect to which the distribution was made; or (3) to a Section 529A ABLE account for the Beneficiary or Member of the Family of the Beneficiary, subject to ABLE account contribution limits. Accounts initiating a roll over will be charged a \$75 fee. The \$75 fee will be waived for roll overs into ABLE accounts.

Special Rollover to Roth IRAs from Long-Term Qualified Tuition Programs

An Account Owner is permitted to rollover from a 529 Account to a Roth IRA without incurring federal or Wisconsin income tax or penalties, subject to the following conditions:

- The Account must have been open for 15 or more years, ending with the date of the rollover;
- Contributions and associated earnings that you transfer to the Roth IRA must have been in the Account for more than 4 years, ending with the date of the rollover;
- The rollover does not exceed the lifetime maximum amount of \$35,000 per designated beneficiary to be rolled over from 529 plan accounts to Roth IRAs;
- The rollover is into a Roth IRA maintained for the benefit of the Beneficiary on the Account; and
- The rollover is sent directly to the Roth IRA.

Please note that Roth IRA income limitations are waived for 529 plan rollovers to Roth IRAs; however, a Roth IRA contribution is subject to the Roth IRA contribution limit for the taxable year applicable to the Beneficiary for all individual retirement plans maintained for the benefit of the Beneficiary.

The IRS may issue additional guidance that may impact 529 plan account rollovers to Roth IRAs, including the above referenced conditions.

State tax treatment of rollovers to a Roth IRA are determined by the state where you file state income tax. Account Owners and Beneficiaries should consult with a qualified tax professional before withdrawing funds for any such rollovers. You are responsible for determining the eligibility of a 529 plan to Roth IRA rollover including tracking and documenting the length of time the 529 plan account has been opened and the amount of assets in your 529 plan account eligible to be rolled into a Roth IRA. **To request a rollover to a Roth IRA, please first contact your Roth IRA administrator to determine their ability and requirements to receive the rollover. Then, submit any required Roth IRA form available from your Roth IRA administrator. If none provided, then submit the Plan rollover form found online at <https://529wi.voya.com> or by calling (866) 677-6933.**

Non-Qualified Withdrawals

In accordance with Section 529 of the Code, the earnings portion of a Non-Qualified Withdrawal may be treated as income to the recipient and is subject to applicable federal and state and/or local income tax. In addition, to satisfy the requirements of Section 529, the earnings portion of a Non-Qualified Withdrawal may be subject to an additional 10% federal tax. Although the Program Manager will report the earnings portion of all distributions, it is the ultimate responsibility of the Account Owner to calculate and report any tax liability; an Account Owner and joint Account Owner may wish to consult with a tax advisor regarding the potential tax implications of any distribution.

Distributions used to qualify for an American Opportunity Credit or Lifetime Learning Credit

A distribution for Qualified Education Expenses that is used by the Beneficiary (or a person who can claim the Beneficiary as a dependent) in qualifying for an American Opportunity or Lifetime Learning Credit (two federal income tax credits that are available to taxpayers with modified adjusted gross incomes below a certain level who incur qualified tuition and related expenses) does not constitute a Qualified Withdrawal. Such a distribution will not be subject to the additional 10% federal tax on earnings, although earnings may be subject to any applicable federal and state and/or local income tax.

Other withdrawals

Death of Beneficiary

In the event of the death of the Beneficiary, the Account Owner may authorize a change in the Beneficiary for the Account to a Member of the Family of the previous Beneficiary or request the withdrawal of the Account balance. A distribution made to a beneficiary of the Beneficiary's estate (or to the Beneficiary's estate) due to the death of the Beneficiary will not be subject to the additional 10% federal tax on earnings, but earnings may be subject to any applicable federal and state and/or local income tax.

Disability of Beneficiary

If the Beneficiary becomes disabled, the Account Owner may authorize a change in the Beneficiary for the Account to a Member of the Family of the previous Beneficiary or request the withdrawal of all or a portion of the Account balance. For this purpose, disability is defined by federal tax law as the Beneficiary's inability to engage in any substantial gainful activity by reason of a medically determinable physical or mental impairment that can be expected to result in death or to be of long-continued and indefinite duration. A distribution due to the disability of the

Beneficiary will not be subject to the additional 10% federal tax on earnings, but earnings may be subject to any applicable federal and state and/or local income tax.

Receipt of scholarship

If the Beneficiary receives a qualified scholarship (including an appointment to a U.S. military service academy), Account assets up to the amount of the scholarship or cost of attendance at a U.S. military service academy may be withdrawn by the Account Owner without imposition of the additional 10% federal tax on earnings. A qualified scholarship includes certain educational assistance allowances under federal law, as well as certain payments for educational expenses (or attributable to attendance at certain educational institutions) that are exempt from federal income tax. The earnings portion of a distribution due to a qualified scholarship may be subject to any applicable federal and state and/or local income tax.

Residual account balances

If the Account Owner does not use the funds for the Beneficiary for any reason and funds remain in the Account, the Account Owner can choose from three options. First, if the Account Owner requests, the remaining funds (including earnings) may be withdrawn by the Account Owner and treated as a Non-Qualified Withdrawal. Earnings will be subject to any applicable federal and state and/or local income tax, potentially including the additional 10% federal tax. Second, the Account Owner may authorize a change of Beneficiary for the Account to a Member of the Family of the current Beneficiary (see “Changing the Beneficiary” for details). Third, the Account Owner may keep the funds in the Account to pay future Qualified Education Expenses (such as graduate or professional school expenses) of the current Beneficiary. Only the first option constitutes a Non-Qualified Withdrawal.

Withdrawal Request Form

To make a withdrawal from an Account, the Account Owner may submit a Withdrawal Request form and provide such other information or documentation as the Tomorrow’s Scholar® 529 Plan may from time to time require. Upon acceptance of a properly completed request, the Program Manager will process the withdrawal from the Account at the next calculated NAV and will generally send the proceeds of the withdrawal within three business days of receiving the request. Payment of the withdrawal may be made by check, wire transfer, or EFT. The Program Manager may charge a fee for a federal wire redemption.

Signature guarantee

A medallion signature guarantee is required for withdrawals addressed to a place other than the address or financial institution account on file, withdrawals made within 30 days of an address change, or for transfers in ownership in any amount. A signature guarantee is verification of the authenticity of the signature given by certain authorized institutions. A medallion signature guarantee may be obtained from a domestic bank or trust company, broker, dealer, clearing agency, savings association, or other financial institution which is participating in a medallion program recognized by the Securities Transfer Association. Please note that signature guarantees are not provided by a notary public.

CHANGES TO AN ACCOUNT

Change of Account Owner

An Account Owner may designate a successor Account Owner (to the extent permissible under applicable law) to succeed to all of the current Account Owner’s rights, title, and interest in an Account (including the right to change the Beneficiary) upon the incapacity or death of the current Account Owner. Such designation must either be on the original Account application or submitted separately in writing and is not effective until it is received and accepted by the Program Manager. An Account Owner may add, change, or revoke the designation of a successor Account Owner by submitting an Account Change Request form (for regular accounts) or a Designation of Successor Custodian form (for UGMA/UTMA accounts).

All other requests to transfer ownership to a successor Account Owner must be submitted in writing. Please contact the Program Manager at 1-866-677-6933 for information needed to complete the change of ownership.

Changing the Beneficiary

Section 529 of the Code generally allows for changes of the Beneficiary without adverse federal income tax consequences, as long as the new Beneficiary is a Member of the Family of the current Beneficiary. In addition, current proposed regulations provide that no federal gift tax or generation-skipping transfer tax will result from a change of the Beneficiary unless the new Beneficiary is in a lower generation than the current Beneficiary. Any change of the Beneficiary to a person who is not a Member of the Family of the current Beneficiary may be treated as a Non-Qualified Withdrawal.

To initiate a change of Beneficiary, the Account Owner must complete and submit a Change of Registration form (and any additional information or documentation required by the Tomorrow’s Scholar® 529 Plan) to the Program Manager. The change will be made upon the Program Manager’s receipt and acceptance of a properly completed form.

An Account Owner who chooses the Age-Based Option should note that the Program Manager may change the age band the Account is invested in if there is a change in the Beneficiary. This may occur if the new Beneficiary is older or younger than the original Beneficiary. The Program Manager may make this Option change so that the Option investment is appropriate for the age of the new Beneficiary.

TAX TREATMENT

The following section is a summary of certain aspects of federal and state taxation of contributions to and withdrawals from 529 Plans. **It is not exhaustive and is not intended as tax advice. Any tax and legal information in this Program Description is merely a summary of our understanding and interpretations of some of the current income tax rules and is not exhaustive. Investors must consult their tax advisors or legal counsel for advice and information concerning their particular situations. The Program Manager, the Underlying Funds, the Board, the State, nor any of their respective representatives may give legal or tax advice.**

The tax and legal description contained herein is based on the Code and other guidance issued by the IRS and Treasury Department under Section 529. It is possible that Congress, the Treasury Department, the IRS, or the courts may take action that will affect Section 529. An individual state’s legislation also may affect the state tax treatment of the Tomorrow’s Scholar® 529 Plan for residents of that state. For more information, please see “Wisconsin state tax”.

It should also be noted that although the Treasury Department has issued proposed regulations interpreting Section 529, such proposed regulations did not address certain issues and also do not reflect certain legislative changes after the issuance of the proposed regulations. It is expected that additional proposed and/or final regulations will be issued that could modify certain of tax rules discussed below and in other sections of this Program Description.

The federal and Wisconsin tax rules applicable to the Tomorrow's Scholar® 529 Plan are complex and some of the rules have not yet been finalized. Their application to any particular person may vary according to facts and circumstances specific to that person. You should consult with a qualified advisor regarding how the laws apply to your circumstances. Any references to specific dollar amounts or percentages in this section are current only as of the date of this Program Description; you should consult with a qualified advisor to learn if the amounts or percentages have been updated.

Taxation of 529 Plans generally

529 Plans allow individuals, trusts, and certain corporate entities to provide for the education related expenses of a beneficiary in a tax advantaged manner. To be eligible for these tax benefits, the funds from a 529 Plan account must be used to pay the Qualified Education Expenses.

Federal taxation of contributions and withdrawals

Federal law does not allow a deduction for contributions to 529 Plans. However, the income earned on any such contributions generally may grow free of federal income tax. Qualified Withdrawals and Qualified Rollovers are not subject to federal income tax. The earnings portion of a Non-Qualified Withdrawal is treated as income to the person who receives it and thus is subject to applicable federal and state and/or local income taxes, potentially including an additional 10% federal tax.

The additional 10% federal tax does not apply to:

- A Qualified Withdrawal;
- A withdrawal made to a beneficiary of the Beneficiary's estate (or to the estate of the Beneficiary) on or after the death of the Beneficiary;
- A withdrawal attributable to the long-continued or permanent disability of the Beneficiary;
- A withdrawal by reason of the receipt of a nontaxable scholarship, allowance, or similar payment (including a payment under the GI Bill or an appointment to a U.S. military service academy) by the Beneficiary (to the extent the amount withdrawn does not exceed the amount of the scholarship, allowance or similar payment);
- A distribution for Qualified Education Expenses that are taken into account by a Beneficiary (or a person who can claim the Beneficiary as a dependent) in qualifying for an American Opportunity Credit or Lifetime Learning Credit; or
- A Qualified Rollover.

The proportion of contributions and earnings for each withdrawal is determined by the Tomorrow's Scholar® 529 Plan based on the relative portions of the Account from which the withdrawal was made representing earnings and contributions as of the withdrawal date.

Taxation of Rollovers

An Account Owner may roll over all or part of the balance of an Account to another 529 Plan account or Section 529A ABL account that accepts Qualified Rollovers without subjecting the earnings portion of the Qualified Rollover to federal income tax, including the additional 10% federal tax. An Account Owner may roll over all or part of the balance of an Account as a Qualified Rollover so long as the amount is placed within 60 days of withdrawal in or is directly transferred: (1) to another 529 Plan for the benefit of the same beneficiary, provided that it has been at least 12 months from the date of a previous transfer to a 529 Plan for that beneficiary; (2) to the credit of another beneficiary under a 529 Plan who is a Member of the Family of the Beneficiary of the Account with respect to which the distribution was made; or (3) to a Section 529A ABL account for the Beneficiary or Member of the Family of the Beneficiary, subject to ABL account contribution limits.

Taxation of transfers

An individual generally may transfer into a 529 Plan, without adverse federal income tax consequences, all or part of:

- Money from an ESA for the same Beneficiary, described in Section 530 of the Code.
- Proceeds from the redemption of a qualified U.S. Savings Bond, described in Section 135 of the Code, subject to modified adjusted gross income limitations.

Please consult your tax advisor.

Special Rollover to Roth IRAs from Long-Term Qualified Tuition Programs

An Account Owner is permitted to rollover from a 529 Account to a Roth IRA without incurring federal or Wisconsin income tax or penalties, subject to the following conditions:

- The Account must have been open for 15 or more years, ending with the date of the rollover;
- Contributions and associated earnings that you transfer to the Roth IRA must have been in the Account for more than 4 years, ending with the date of the rollover;
- The rollover does not exceed the lifetime maximum amount of \$35,000 per designated beneficiary to be rolled over from 529 plan accounts to Roth IRAs;
- The rollover is into a Roth IRA maintained for the benefit of the Beneficiary on the Account; and
- The rollover is sent directly to the Roth IRA.

Please note that Roth IRA income limitations are waived for 529 plan rollovers to Roth IRAs; however, a Roth IRA contribution is subject to the Roth IRA contribution limit for the taxable year applicable to the Beneficiary for all individual retirement plans maintained for the benefit of the Beneficiary.

The IRS may issue additional guidance that may impact 529 plan account rollovers to Roth IRAs, including the above referenced conditions.

State tax treatment of rollovers to a Roth IRA are determined by the state where you file state income tax. Account Owners and Beneficiaries should consult with a qualified tax professional before withdrawing funds for any such rollovers. You are responsible for determining the eligibility of a 529 plan to Roth IRA rollover including tracking and documenting the length of time the 529 plan account has been opened and the amount of assets in your 529 plan account eligible to be rolled into a Roth IRA. **To request a rollover to a Roth IRA, please first contact your Roth IRA administrator to determine their ability and requirements to receive the rollover. Then, submit any required Roth IRA form available from your Roth IRA administrator. If none provided, then submit the Plan rollover form found online at <https://529wi.voya.com> or by calling (866) 677-6933.**

Refunds of Payments of Qualified Education Expenses.

If an Eligible Education Institution refunds any portion of an amount previously withdrawn from an Account and treated as a Qualified Withdrawal, unless you contribute such amount to a 529 Plan for the same Beneficiary not later than 60 days after the date of the refund, you may be required to treat the amount of the refund as a Non-Qualified Withdrawal for federal income tax purposes. Different treatment may apply if the refund is used to pay other Qualified Education Expenses of the Beneficiary.

Federal gift and estate tax issues

The tax treatment summarized in this section is complicated and will vary depending on your individual circumstances. You should consult with a qualified advisor regarding the application of these tax provisions to your particular circumstances.

Contributions (including certain Qualified Rollover contributions) to a 529 Plan account generally are considered completed gifts to the Beneficiary and are eligible for the applicable annual exclusion from federal gift and generation-skipping transfer taxes. For the current contribution amounts exempt from federal gift tax and the current gift tax rate, please refer to the “**Program Summary.**”

Except in the situations described in this paragraph, if the Account Owner were to die while assets remained in a 529 Plan account, the value of the Account would not be included in the Account Owner’s estate. In cases where contributions to a 529 Plan account exceed the applicable annual exclusion amount for a single Beneficiary, the contributions may be subject to federal gift tax and, possibly, the generation-skipping transfer tax in the year of contribution. However, in these cases, a contributor may elect to apply the contribution against the annual exclusion equally over a five-year period. This option is applicable only for contributions up to five times the available annual exclusion amount in the year of the contribution. Once this election is made, if the contributor makes any additional gifts to the same Beneficiary in the same or the next four years, such gifts may be subject to federal gift or generation-skipping transfer taxes in the calendar year of the gift. However, any excess gifts may be applied against the contributor’s federal lifetime gift-tax exemption.

In addition, to the extent not previously used in prior years, each Account Owner has a federal lifetime exemption that may be applied to gifts in excess of the annual exclusion amounts referred to above or an individual’s gross estate. For the current lifetime exemption, please refer to the “**Program Summary.**” While federal gift tax returns are required for gifts in excess of the annual exclusion amounts referred to in the Program Summary (including gifts that the Account Owner elects to treat as having been made ratably over a five-year period), no federal gift tax will be due until the federal lifetime exemption has been used.

If the Account Owner chooses to use the five-year forward election and dies before the end of the five-year period, the portion of the contribution allocable to the years remaining in the five-year period (beginning with the year after the Account Owner’s death) would be included in the Account Owner’s estate for federal estate tax purposes. If the Beneficiary of a 529 Plan account is changed or amounts in an Account are rolled over to a new Beneficiary of the same generation as the former Beneficiary (or an older generation), a federal gift or generation-skipping transfer tax will not apply. If the new Beneficiary is of a younger generation than the former Beneficiary, there may be a taxable gift to the extent of the amount transferred. Federal generation-skipping transfer taxes may apply if the new Beneficiary is in a younger generation than the original Beneficiary. The five-year rule explained above may be applicable here. In certain circumstances, the gross estate of a Beneficiary may include the value of the 529 Plan account. Please consult with your tax advisor for further information.

Federal estate, gift, and generation-skipping tax issues arising in conjunction with 529 Plans can be quite complicated. You should consult your tax advisor if you have any questions about these issues.

For the treatment of transfers to another 529 plan sponsored by the State for the same Beneficiary, please see “Investment changes”.

Wisconsin state tax considerations

The following discussion applies only with respect to Wisconsin taxes. Wisconsin tax treatment in connection with the Tomorrow’s Scholar® 529 Plan applies only to Wisconsin taxpayers. You should consult with a qualified advisor regarding the application of Wisconsin tax provisions to your particular circumstances. Any references to specific dollar amounts in this section are current only as of the date of this Program Description; you should consult with a qualified advisor to find out if the amounts have been updated.

Contributions

Contributors may reduce their Wisconsin taxable income with contributions made to an Account during the tax year, up to a maximum annual amount of their contribution (adjusted annually for inflation) per Beneficiary. For the current maximum annual contribution deduction, please refer to the “Program Summary.” The principal amount of an incoming Qualified Rollover from another state’s qualified tuition program made after April 15, 2015 qualifies as a contribution eligible for the Wisconsin income tax deduction. Contributions made during the tax year or on or before the original due date of the contributor’s return (generally April 15th of the following year) are deductible up to the maximum amount for the tax year. Contribution amounts exceeding the maximum reduction amount for the tax year may be carried forward to future tax years and reduced subject to the maximum reduction amount of those years. Each contribution may be deducted only once. Any carryover amounts will be reduced by any amount of a Non-Qualified Withdrawal that is not otherwise added back to Wisconsin income. The reduction is available to any contributor who makes contributions during the tax year, regardless of whether they are the Account Owner and regardless of the relationship between the contributor and the Beneficiary. The reduction described above may appear on your Wisconsin income tax return as a subtraction to income.

The amount of reductions by contributors who are nonresidents, or part-year residents of Wisconsin, is further limited based on the ratio the contributor’s income that is taxable by Wisconsin bears to the contributor’s total income for the year of the contribution. The contribution reduction may also not exceed the contributor’s Wisconsin income computed without the reduction.

Employers that contribute to their employees' Wisconsin Trust accounts may be eligible for a Wisconsin state tax credit. Employers may receive a tax credit equal to 50% of the total contributions that the employer makes to a Wisconsin Trust account for its employee up to a maximum amount across all accounts of \$840 per employee per tax year. Employers should consult a tax advisor regarding the availability and ramifications of this credit.

Withdrawals

Wisconsin's income taxation of withdrawals and outgoing Qualified Rollovers follows the federal income tax treatment described above. Earnings from the investment of contributions to an Account will not be subject to Wisconsin income tax, if at all, until funds are withdrawn in whole or in part from the Account. The earnings portion of withdrawals, other than Qualified Withdrawals, will be included in the taxable income of the distributee and will be subject to Wisconsin income tax. A Qualified Withdrawal will not be included in taxable income and will not be subject to Wisconsin income tax. You may also generally rollover funds from an account without adverse Wisconsin tax consequences, provided the rollover is a Qualified Rollover. The amount of an outgoing Qualified Rollover made to another state's 529 Plan on or after June 1, 2014, however, will be added to Wisconsin income and taxed to the extent that the amount was previously claimed as a deduction. For tax years beginning on or after December 31, 2017, taxpayers may not claim the separate Wisconsin deduction available for tuition expenses if the source of the payment is an amount withdrawn from the Tomorrow's Scholar® 529 Plan. Account Owners should consult with a qualified tax advisor regarding the use of withdrawals to pay for primary and secondary school tuition.

Recapture

The Wisconsin 529 College Savings Programs requires the use of a "first in, first out" method of accounting. Any withdrawals taken within 365 days after a contribution has been made to the Account must be added to Wisconsin income to the extent the contribution was previously deducted from Wisconsin income, given the Account balance was less than the withdrawal amount prior to the contribution, and the withdrawal has not otherwise been added back to Wisconsin income.

Contributions exceeding the maximum deduction amount for the tax year may be carried forward to future tax years. However, carry-over of contributions in excess of the maximum annual tax deduction threshold also must be added back to Wisconsin income if the carry-over amount was withdrawn from the account within 365 days of being carried over.

Effective June 1, 2014, Non-Qualified Withdrawals of contributions made after 2013 will be added to Wisconsin income and taxed to the extent the receipt of such amounts results in the additional 10% tax for federal tax purposes but only if the amount was previously claimed as a deduction.

Taxes Imposed by Other Jurisdictions

Prospective Account Owners should consider the potential impact of income taxes imposed by jurisdictions other than Wisconsin. It is possible that other state or local taxes apply to withdrawals from or accumulated earnings within the Tomorrow's Scholar® 529 Plan, depending on the residency, domicile, or sources of taxable income of the Account Owner or the Beneficiary. Account Owners and Beneficiaries should consult with a qualified advisor regarding the applicability of state or local taxes imposed by other jurisdictions.

Coordination with other higher education expense benefit programs

In addition to the income tax benefits provided to Account Owners and Beneficiaries under Section 529, benefits are provided by several other provisions of the Code for education-related investments or expenditures. These include Coverdell ESAs, Hope /American Opportunity Credits, Lifetime Learning Credits and "qualified United States savings bonds" described in Code Section 135 ("qualified U.S. savings bonds"). The available tax benefits for paying Qualified Education Expenses available through these programs must be coordinated in order to avoid the duplication of such benefits. Account Owners should consult a qualified tax advisor regarding the interaction under the Code of the federal income tax education-incentive provisions addressing account withdrawals.

Education savings accounts.

You may contribute money to, or withdraw money from, both a 529 Plan account and an ESA in the same year. However, to the extent the total withdrawals from both programs exceed the amount of the Qualified Education Expenses incurred that qualifies for tax-free treatment under Section 529 of the Code, the Beneficiary must allocate his or her Qualified Education Expenses between both such withdrawals in order to determine how much may be treated as tax-free under each program.

American Opportunity Tax Credit ("AOTC") and Lifetime Learning Credit.

The use of an AOTC or Lifetime Learning Credit by a qualifying Account Owner and Beneficiary will not affect participation in or receipt of benefits from an Account, so long as any withdrawal from your Account is not used for the same expenses for which the credit is claimed. For example, you may claim an AOTC credit to pay for tuition and request a distribution from your Account for room and board expenses. The AOTC replaces the previous Hope Scholarship Tax Credit.

TOMORROW'S SCHOLAR® 529 PLAN RISKS AND CONSIDERATIONS

The Tomorrow's Scholar® 529 Plan is an investment vehicle. Accounts in the Tomorrow's Scholar® 529 Plan are subject to certain risks. In addition, certain Options carry more and/or different risks than others. An Account Owner should weigh such risks with the understanding that they could arise at any time during the life of an Account.

No guarantee of income or principal

Investments are subject to standard investment risks including (but not limited to) market and interest rate risks. The value of an Account may increase or decrease over time based on the performance of the selected Option(s). This may result in the value of the Account being more or less than the amount contributed. Neither the Program Manager, the Underlying Funds, the Board, the State, nor any instrumentality thereof, makes any guarantee of, nor has any legal obligations to ensure, the ultimate payout of any amount, including a return of contributions made to an Account. In addition, no level of investment return is guaranteed by the Program Manager, the Underlying Funds, the Board, the State or any instrumentality thereof.

Limited investment direction

In general, an Account Owner, contributor, or Beneficiary may not direct the investment of an Account other than an Account Owner directs the Option(s) in which a contribution will be invested. Once an Option selection has been made at the time of enrollment or subsequent contribution, federal law limits investment changes for existing balances to twice per calendar year and any time the Beneficiary of the Account is changed to a Member of the Family of the current Beneficiary. The ongoing money management is the responsibility of the Board. The Board has control over the Option's investment allocations and reserves the right to change them at its discretion, including, but not limited to, the ability to change underlying investments of an Option, closing an Option to Accounts and/or additional contributions, and adding new Options.

Allocation methodology risk

An Account in the Age-Based Option is subject to the risk that the allocation methodology (glide path) will not meet an investor's goals. The allocation methodology will not eliminate the market volatility, which could reduce the amount of funds available when the Account Owner intends to begin to withdraw a portion or all of the Account Owner's investment in the Option. This point-in time risk is greater for an Account Owner who begins to withdraw a portion or all of the Account Owner's investment in the Option, on or around the Beneficiary's date of enrollment. Accordingly, Account Owners should periodically assess, and if appropriate, adjust their investment choices with their investment time horizons, risk tolerances and investment objectives in mind.

Illiquidity

The circumstances in which Account assets may be withdrawn without a penalty or adverse tax consequences are limited. This reduces the liquidity of an investment in an Account.

Limited Obligation

The Tomorrow's Scholar® 529 Plan is NOT backed by the full faith and credit of the State or any other government entity.

Potential program adjustments

The Board may, during the life of the Tomorrow's Scholar® 529 Plan, make changes to the Tomorrow's Scholar® 529 Plan, such as adding, closing, or consolidating Options. No consent or approval from Account Owners is required in connection with such changes. Account Owners who have established Accounts prior to the time a change is made available may be prohibited (according to Section 529) from participating in such changes, unless they open new Accounts. In addition, the Board may, at any time, change an Option's investment policy, including, but not limited to, changing investment objectives, modifying the target asset allocation, and replacing underlying investments held by the Option. Any such change could negatively impact performance of the affected Option. There is no assurance that the investment policy for an Option will remain in effect for the duration of your investment.

The Program Manager may not continue to provide management, administration, distribution, recordkeeping, and certain administrative services to the Tomorrow's Scholar® 529 Plan for the entire period an Account is open. The Program Manager's agreement to provide these services is set to expire on October 29, 2026. The agreement may be terminated sooner or extended longer under certain circumstances. The Board may hire new or additional Tomorrow's Scholar® 529 Plan managers in the future to manage all or part of the Tomorrow's Scholar® 529 Plan's assets. The Options and the Underlying Funds may be changed. There is no assurance that the Tomorrow's Scholar® 529 Plan fees and charges or the other terms and conditions of the Participation Agreement will continue without material change.

Status of federal and state law and regulations governing the program

Federal and Wisconsin law and regulations governing the administration of 529 Plans could change in the future, sometimes on a retroactive basis. In addition, federal and state laws regarding the funding of education expenses, treatment of financial aid, and tax matters also could change in the future. It is unknown what effect these kinds of changes could have on an Account. You should also consider the potential impact of any other state laws applicable to your account.

No indemnification

Neither the Program Manager, the Underlying Funds, the Board, the State, nor any instrumentality thereof, indemnifies any Account Owner or Beneficiary against losses or other claims arising from the official or unofficial acts, negligent or otherwise, of Board members or State employees.

No guarantee of admittance

Participation in the Tomorrow's Scholar® 529 Plan does not guarantee or otherwise provide a commitment that the Beneficiary will be admitted to or allowed to continue to attend or receive a degree from any educational institution. Participation in the Tomorrow's Scholar® 529 Plan does not guarantee that a Beneficiary will be treated as a state resident of any state for tuition or any other purpose.

No guarantee that investments will cover education expenses

There is no guarantee that the future Account value will be sufficient to cover Qualified Education Expenses at the time of withdrawal.

Suitability

Neither the Board, the Program Manager, the Underlying Funds, the State nor any instrumentality thereof, except as required by law, make any representations regarding the appropriateness of the Tomorrow's Scholar® 529 Plan as an investment. Other types of investments may be more appropriate depending upon an Account Owner's or Beneficiary's investment objectives, financial status, tax situation, risk tolerance, or age. There are programs and investment options other than the Tomorrow's Scholar® 529 Plan available as education investment alternatives. They may entail tax and other fee or expense consequences and features different from the Tomorrow's Scholar® 529 Plan, including, for example, different investment options. Anyone considering investing in the Tomorrow's Scholar® 529 Plan may wish to consider these alternatives and/or consult a tax or financial advisor to seek advice concerning the appropriateness of this investment prior to opening an Account.

Eligibility for financial aid

Federal financial aid. As with other investment accounts, the value of Account assets may be considered in a student's federal financial aid determinations. If the Account Owner is the student's parent, the Account balance may be treated as a parental asset. As a general matter, a smaller percentage of such parental assets than of student assets is deemed available in each year to the student, and accordingly parental assets generally have a lesser impact than student assets for purposes of determining federal financial aid eligibility. In cases where the Account Owner is a dependent student (whether through an UGMA/UTMA custodian or directly), the available balance is treated as a parental asset, and accordingly a certain percentage of such Account assets will be deemed available to the student in each year for federal financial aid purposes. In cases where the Account Owner is an independent student, the available balance is treated as a student asset, and accordingly a certain percentage of the Account assets are deemed available to the student in each year for federal financial aid purposes. Assets in an Account not owned by a parent or student generally are not considered in the student's need analysis for federal financial aid purposes.

School-based financial aid. Some educational institutions have indicated that they will consider the balances in a 529 Plan account when determining eligibility for financial aid provided by such institutions. You should consult your financial aid advisor for more information.

Wisconsin State-funded financial aid. Wisconsin law specifies that the Tomorrow's Scholar® 529 Plan assets will NOT affect a Beneficiary's eligibility for State-funded financial aid. The Tomorrow's Scholar® 529 Plan assets can be excluded from Wisconsin State financial aid calculations by contacting the Higher Education Aids Board and having the assets removed from the "expected family contribution" calculations. It is possible that Account assets may have an adverse effect on the Beneficiary's eligibility for other financial aid programs. Policies on the treatment of the Tomorrow's Scholar® 529 Plan assets will vary at different institutions and over time. Account Owners and Beneficiaries should check on applicable laws, regulations, financial aid programs, and institutional requirements concerning the impact of the Tomorrow's Scholar® 529 Plan assets on eligibility.

Creditor protection

The federal Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 created guidelines regarding creditor protection for 529 Plans. Federal law now provides certain creditor protections based on the timing of contributions and the debtor's relationship to the Beneficiary. In general, contributions to a 529 Plan account on which the debtor is the Account Owner made less than one year before the filing of a bankruptcy petition are included in the debtor's bankruptcy estate and are not protected from creditors. Contributions to a debtor's 529 Plan account made more than one year before the filing of a bankruptcy petition are generally not considered part of a debtor's bankruptcy estate, provided the following conditions are met:

- The contributions are not deemed excess contributions or extensions of credit;
- The beneficiary at the time the contribution is made is the debtor's child, stepchild, grandchild, or step-grandchild; and
- The protection from creditors of contributions made more than one year but less than two years prior to the filing of the bankruptcy petition is limited up to a maximum of \$5,000.

The Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 set federal guidelines for bankruptcy proceedings. However, certain bankruptcy and creditor protection laws rest with each state. The Trust was established in Wisconsin. Under Wisconsin law, an Account in the Tomorrow's Scholar® 529 Plan is not subject to garnishment, lien, levy, attachment, execution, or other process of law. Consult a legal advisor regarding the application of this specific law to your particular circumstances and to determine whether this state or federal protection may apply to your situation.

OTHER INFORMATION

Investment policies

The Program Manager shall ensure that any contributions to the Tomorrow's Scholar® 529 Plan shall be invested in the appropriate Option selected by the Account Owner within the same business day as received and accepted by the Transfer Agent if the contribution is received and accepted by the Transfer Agent in good form prior to the close of business of the NYSE. If a contribution is received by the Transfer Agent in good form on a non-business day or after the close of business on a business day, the contribution shall be invested in the appropriate Option during the next business day. Contributions will be invested in the units of the selected Option(s) based on the NAV per unit next calculated after the contribution is received by the Transfer Agent in good form. Excess contributions will not be invested (see "Excess contributions"). Interest, dividends, and/or capital gains paid by the Underlying Funds are reinvested within the applicable Option. Distributions of any net investment income paid by underlying investments in any Option are reinvested and used to purchase additional units in each such Option. Reinvested distributions from any Option are not subject to sales charges.

Each Option's per unit NAV is calculated by dividing the Option's net assets by the number of outstanding units at that time. The Options' investment allocations are monitored daily, seeking to ensure that the Options stay within 3% of their target allocations. In the event that market fluctuations cause an Option to move outside of its target allocations, steps will be taken to bring it back into line with the investment allocations described in the table in "Appendix B: Allocations to Underlying Funds" within a commercially reasonable period.

Statements and reporting

Confirmation statements will be mailed for any activity in the Account, except generally for AIP transactions and any reinvested distributions. All Account Owners will receive quarterly Account statements that indicate the contributions made during that time period, cumulative contributions to the account, disbursements made from the Account during that time period, and the total value of the Account at the end of that time period. Account Owners will also receive an annual summary of all Account activity for the calendar year.

Electronic delivery of program documents

You may elect to receive your Account statements, transaction confirmations, program descriptions, and other documents electronically. If you make this election, you will be notified by email when the most recent documents or statements are available for viewing and downloading through the Program Manager's website. For security reasons, online access to Account statements and transaction confirmations will require the establishment of a login ID and password prior to viewing.

To receive documents electronically, you must have an email account and an Internet browser that meets the requirements described in the Privacy and Security section of the Tomorrow's Scholar® 529 Plan's website at www.tomorrowsscholar.com. The email address provided in your

Account application will be used to send email notifications to you and should be a personal or non-business email address. You may change your electronic delivery preferences or revoke your election to receive documents electronically at any time by logging in to your Account online at www.tomorrowsscholar.com, or call 1-866-677-6933.

Householding

To help keep Option expenses low, a single copy of a program description may be sent to Account Owners of the same household. If your household currently receives a single copy of a program description and you would prefer to receive multiple copies, please contact your financial advisor, or call 1-866-677-6933.

Continuing disclosure

The Distributor acts in conjunction with the State to help ensure compliance with Rule 15c2-12(b)(5)(i) under the Securities Exchange Act of 1934, as amended. Under the terms of the Continuing Disclosure Undertaking dated April 28, 2006 among the Wisconsin Department of Administration, the Distributor and the Board (the "Undertaking"), the Distributor produces and disseminates certain annual financial information and operating data relating to the Tomorrow's Scholar® 529 Plan and makes provisions for the filing of this annual information with each Nationally Recognized Municipal Securities Information Repository (NRMSIR) and with a State information depository, as applicable, or, for filings made on or after July 1, 2009, with the MSRB's Electronic Municipal Market Access (EMMA) disclosure system. The Distributor also has contractually assumed responsibility for filing any applicable material event notices under Rule 15c2-12(b)(5)(i)(C) and the Undertaking. For additional information, see www.emma.msrb.org. In addition, audited financial statements for the Tomorrow's Scholar® 529 Plan are made available via EMMA and by contacting the State at 1-608-264-7899.

PRIVACY: IMPORTANT NOTICE

The Board considers protecting the privacy and security of the nonpublic, personal information it holds concerning each Participant and Designated Beneficiary a top priority. The Board has also received assurance from Voya that it is a top priority for Voya. Specifically, both the Board and Voya adhere to the following privacy policy for the benefit of current and past Participants and Designated Beneficiaries.

Types of information collected

The types of nonpublic, personal information collected by the Board, Voya, and nonaffiliated third parties acting on Voya's behalf may include:

- Information the Participant or Designated Beneficiary provides to the Advisor Program on the Application or otherwise, such as name, address, and Social Security number;
- Information the Board, Voya, and authorized third parties may acquire as a result of administering an Account, such as transactions (contributions or distributions) or account balance; and
- Information from third parties that assists us in servicing your account and marketing products to you to better serve your investment goals.

Limitation on sharing of information

Wisconsin State law provides that the Board and Voya, acting as its agent, must keep personal and financial information pertaining to an Account Owner or a Designated Beneficiary private, except that the Board may release to the appropriate State agency the information necessary in determining a Designated Beneficiary's eligibility for State financial aid for higher education. Neither the Board nor Voya will disclose such nonpublic, personal information to anyone except as permitted by law.

The Board or Voya may in the future use information about the Participant or Designated Beneficiary to identify and alert the Participant about savings or investment programs that may be of interest to the Participant. If the Participant does not want to receive such information, the participant should call Voya at 1-866-677-6933.

Security

The Board and Voya, maintain appropriate physical, electronic, and procedural safeguards to protect this nonpublic, personal information about Participants and Designated Beneficiaries.

Tomorrow's Scholar® 529 Plan
c/o Voya Investment Management
P.O. Box 534472
Pittsburgh, PA 15253-4472
1-866-677-6933
www.tomorrowsscholar.com

APPENDIX A: INVESTMENT OPTIONS – EFFECTIVE APRIL 28, 2025

Age-Based Options	Single Fund Options
Voya 529 Age 0-4 Option (14-18 years to enrollment)	American Century Small Cap Value Option
Voya 529 Age 5-8 Option (10-13 years to enrollment)	Fidelity Global ex-US Index Option
Voya 529 Age 9-10 Option (8-9 years to enrollment)	Fidelity U.S. Bond Index Option
Voya 529 Age 11-12 Option (6-7 years to enrollment)	BlackRock Global Allocation Option
Voya 529 Age 13-14 Option (4-5 years to enrollment)	Nuveen Balanced Option
Voya 529 Age 15 Option (3 years to enrollment)	Nuveen Equity Index Option
Voya 529 Age 16 Option (2 years to enrollment)	Nuveen Small-Cap Blend Index Option
Voya 529 Age 17 Option (1 years to enrollment)	TIAA-CREF Principal Protection Option
Voya 529 Age 18+ Option (at enrollment)	Voya Corporate Leaders® 100 Option
	Voya GNMA Income Option
	Voya High Yield Bond Option
Static Allocation Options	Voya Intermediate Bond Option
Voya 529 Aggressive Growth Option	Voya Large Cap Growth Option
Voya 529 Balanced Option	Voya Large Cap Value Option
Voya 529 Conservative Plus Option	Voya Mid Cap Opportunities Option
Voya 529 Growth Plus Option	Voya Multi-Manager International Equity Option
Voya 529 Ultra Conservative Option	Voya Multi-Manager Mid Cap Value Option
	Voya Small Cap Growth Option

The table below includes a description of each Option’s investment strategy and principal investment risks. Each Option’s principal investment risks correspond to the principal investment risks of each Underlying Fund in which the Option seeks to invest at least 5% of its net assets. As such, you should understand that an Option may be subject to additional investment risks. Additional detail about the principal investment risks listed below may be found in “Appendix C: Risks Applicable to the Investment Options.”

Age-Based Options	Investment Strategies	Principal Investment Risks
Voya 529 Age 0-4 Option	Invests primarily in mutual funds that invest in aggressive investments, seeking capital appreciation.	Asset Allocation, Bank Instruments, China Investing Risks, Company, Convertible Securities, Credit, Credit Default Swaps, Currency, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Initial Public Offerings, Interest in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mid-Capitalization Company, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Securities Lending, Small-Capitalization Company, U.S. Government Securities and Obligations, Value Investing
Voya 529 Age 5-8 Option	Invests in mutual funds that invest in a combination of conservative and aggressive investments and seeks both capital appreciation and income with an emphasis on growth.	Asset Allocation, Bank Instruments, Company, Convertible Securities, Credit, Credit Default Swaps, Currency, Derivative Instruments, Dividend, Environmental, Social, and Governance, Floating Rate Loans, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Interest in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Securities Lending, Small-Capitalization Company, U.S. Government Securities and Obligations, Value Investing
Voya 529 Age 9-10 Option	Seeks both capital appreciation and income by investing in mutual funds that invest in a combination of aggressive and conservative investments.	Asset Allocation, Bank Instruments, China Investing Risks, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Derivative Instruments, Dividend, Environmental, Social, and Governance, Floating Rate Loans, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Initial Public Offerings, Interest

Age-Based Options	Investment Strategies	Principal Investment Risks
		in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Securities Lending, Small-Capitalization Company, Sovereign Debt U.S. Government Securities and Obligations, Value Investing
Voya 529 Age 11-12 Option	Seeks both capital appreciation and income by investing in mutual funds that invest in a combination of aggressive and conservative investments.	Asset Allocation, Bank Instruments, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Derivative Instruments, Dividend, Environmental, Social, and Governance, Floating Rate Loans, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Interest in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Securities Lending, Small-Capitalization Company, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing
Voya 529 Age 13-14 Option	Seeks both capital appreciation and income by investing in a combination of aggressive and conservative investments.	Asset Allocation, Bank Instruments, Borrowing, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Deflation, Derivative Instruments, Dividend, Environmental, Social, and Governance, Floating Rate Loans, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Inflation-Indexed Bonds, Interest in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mid-Capitalization Company, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Option Writing, Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Restricted Securities, Securities Lending, Small-Capitalization Company, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing
Voya 529 Age 15 Option	Invests in mutual funds that invest primarily in conservative investments, seeking a balance of protection of principal with the opportunity for capital appreciation.	Asset Allocation, Bank Instruments, Borrowing, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Deflation, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High-Yield Securities, Index Strategy, Inflation-Indexed Bonds, Interest in Loans, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Option Writing, Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Restricted Securities, Securities Lending, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing, Zero-Coupon Bonds and Pay-in-Kind Securities
Voya 529 Age 16 Option	Invests in mutual funds that invest primarily in conservative investments, seeking a balance of protection of principal with the opportunity for capital appreciation.	Asset Allocation, Bank Instruments, Borrowing, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Deflation, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High-Yield

Age-Based Options	Investment Strategies	Principal Investment Risks
		Securities, Index Strategy, Inflation-Indexed Bonds, Interest in Loans, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage-and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Option Writing, Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Restricted Securities, Securities Lending, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing, Zero-Coupon Bonds and Pay-in-Kind Securities
Voya 529 Age 17 Option	Invests in mutual funds that invest primarily in conservative investments, seeking a balance of protection of principal with the opportunity for capital appreciation.	Asset Allocation, Bank Instruments, Borrowing, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Deflation, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High-Yield Securities, Index Strategy, Inflation-Indexed Bonds, Interest in Loans, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage-and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Option Writing, Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Restricted Securities, Securities Lending, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing, Zero-Coupon Bonds and Pay-in-Kind Securities
Voya 529 Age 18+ Option	Invests in mutual funds that invest primarily in conservative investments seeking protection of principal. Please note that while the Voya 529 Age 18+ Option seeks to preserve the value of your investment, it is possible to lose money by investing in the Option.	Asset Allocation, Bank Instruments, Borrowing, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Deflation, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High-Yield Securities, Index Strategy, Inflation-Indexed Bonds, Interest in Loans, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage-and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Option Writing, Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Restricted Securities, Securities Lending, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing, Zero-Coupon Bonds and Pay-in-Kind Securities
Static Allocation Options	Investment Strategies	Principal Investment Risks
Voya 529 Aggressive Growth Option	Invests in mutual funds that invest primarily in aggressive investments, seeking capital appreciation.	Bank Instruments, China Investing Risks, Company, Convertible Securities, Credit, Credit Default Swaps, Currency, Derivative Instruments, Environmental, Social, and Governance, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Initial Public Offerings, Interest in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mid-Capitalization Company, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Securities Lending, Small-Capitalization Company, U.S. Government Securities and Obligations, Value Investing
Voya 529 Balanced Option	Seeks both capital appreciation and income by investing in mutual funds that invest in a	Asset Allocation, Bank Instruments, China Investing Risks, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit

Static Allocation Options	Investment Strategies	Principal Investment Risks
	combination of aggressive and conservative investments.	Default Swaps, Currency, Derivative Instruments, Dividend, Environmental, Social, and Governance, Floating Rate Loans, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Initial Public Offerings, Interest in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mid-Capitalization Company, Mortgage-and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Securities Lending, Small-Capitalization Company, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing
Voya 529 Conservative Plus Option	Invests in mutual funds that invest primarily in conservative investments, seeking a balance of protection of principal with the opportunity for capital appreciation.	Asset Allocation, Bank Instruments, Borrowing, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High-Yield Securities, Index Strategy, Interest in Loans, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Restricted Securities, Securities Lending, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing, Zero-Coupon Bonds and Pay-in-Kind Securities
Voya 529 Growth Plus Option	Invests mutual funds that invest in a combination of aggressive and conservative investments, seeking both capital appreciation and income with an emphasis on growth.	Asset Allocation, Bank Instruments, China Investing Risks, Company, Convertible Securities, Credit, Credit Default Swaps, Currency, Derivative Instruments, Dividend, Environmental, Social, and Governance, Floating Rate Loans, Focused Investing (Index), Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, High-Yield Securities, Index Strategy, Initial Public Offerings, Interest in Loans, Interest Rate, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mid-Capitalization Company, Mortgage-and/or Asset-Backed Securities, Municipal Obligations, Non-Diversification (Index), Other Investment Companies, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Securities Lending, U.S. Government Securities and Obligations, Value Investing
Voya 529 Ultra Conservative Option	Invests in mutual funds that invest primarily in conservative investments seeking protection of principal. Please note that while the Voya 529 Ultra Conservative Option seeks to preserve the value of your investment, it is possible to lose money by investing in the Option.	Asset Allocation, Bank Instruments, Borrowing, Collateralized Loan Obligations and Other Collateralized Obligations, Company, Convertible Securities, Covenant-Lite Loans, Credit, Credit Default Swaps, Currency, Deflation, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High-Yield Securities, Inflation-Indexed Bonds, Interest in Loans, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Option Writing, Other Investment Companies, Portfolio Turnover, Preferred Stocks, Prepayment and Extension, Real Estate Companies and Real Estate Investment Trusts, Repurchase Agreements, Restricted Securities, Securities Lending, Sovereign Debt, U.S. Government Securities and Obligations, Value Investing, Zero-Coupon Bonds and Pay-in-Kind Securities

Single Fund Options	Investment Strategies	Principal Investment Risks
American Century Small Cap Value Option	Through its investments in American Century Small Cap Value Fund (advised by American Century Investment Management Inc.), the Option seeks long-term capital growth. Income is a secondary objective. Under normal market conditions, the Fund invests at least 80% of its net assets in small cap companies.	Company, Market, Price Volatility, Real Estate Companies and Real Estate Investment Trusts, Redemption, Small Capitalization Company, Value Investing
BlackRock Global Allocation Option	Through its investments in BlackRock Global Allocation Fund, Inc. (advised by BlackRock Advisors, LLC), the Option seeks to provide high total investment return through a fully managed investment policy utilizing United States and foreign equity securities, debt and money market securities, the combination of which will be varied from time to time both with respect to types of securities and markets in response to changing market and economic trends.	Commodities Related Investments, Convertible Securities, Corporate Loans, Debt Securities, Derivatives Investments, Distressed Securities, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High Portfolio Turnover, High-Yield Securities, Index Strategy, Leverage, Market, Mid-Capitalization Companies, Mortgage- and Asset-Backed Securities, Precious Metal and Related Securities, Preferred Securities, Real Estate Companies and Real Estate Investment Trusts, Risk of Loan Assignments and Participations, Small-Capitalization Companies, Sovereign Debt, Structured Notes, Subsidiary, Warrants
Fidelity Global ex-US Index Option	Through its investments in Fidelity Global ex U.S. Index Fund (advised by Fidelity Management & Research Company LLC), the Option seeks to provide investment results that correspond to the total return of foreign developed and emerging stock markets. The fund normally invests at least 80% of assets in securities included in the MSCI ACWI ex USA Index and in depositary receipts representing securities included in the Index.	Correlation to Index, Foreign and Emerging Markets, Geographic Exposure to Asia, Geographic Exposure to Europe, Issuer-Specific Changes, Passive Management, Securities Lending, Stock Market Volatility
Fidelity U.S. Bond Index Option	Through its investments in Fidelity U.S. Bond Index Fund (advised by Fidelity Management & Research Company LLC), the Option seeks to provide investment results that correspond to the aggregate price and interest performance of the debt securities in the Bloomberg U.S. Aggregate Bond Index. The fund normally invests at least 80% of assets in bonds included in the Bloomberg U.S. Aggregate Bond Index.	Correlation to Index, Foreign Exposure, Interest Rate Changes, Issuer-Specific Changes, Leverage, Passive Management, Prepayment
Nuveen Balanced Option (formerly, TIAA-CREF Balanced Option)	Through its investments in two Nuveen mutual funds (65% in Nuveen Equity Index Fund (formerly, TIAA-CREF Equity Index Fund) and 35% in Nuveen Bond Index Fund (formerly, TIAA-CREF Bond Index Fund)), considered index funds, the Option seeks to track benchmark indices, the Russell 3000® Index and Bloomberg U.S. Aggregate Bond Index. The Nuveen Balanced Option is the only Single Fund Option that invests in more than one underlying fund.	Call, Credit, Credit Spread, Downgrade, Fixed-Income Foreign Investment, Floating Rate Loans, Illiquid Investments, Income Volatility, Index Strategy, Interest Rate, Issuer, Large-Capitalization Companies, Market, Market Volatility, Liquidity and Valuation, Mid-Capitalization Companies, Non-Diversification (Index), Prepayment and Extension, Small Capitalization Company and U.S. Government Securities and Obligations
Nuveen Equity Index Option (formerly, TIAA-CREF Equity Index Option)	Through its investments in Nuveen Equity Index Fund (formerly, TIAA-CREF Equity Index Fund) (an index fund) (advised by Teachers Advisors LLC.), the Option seeks a favorable long-term total return, mainly through capital appreciation, by investing primarily in a portfolio of equity securities selected to track the overall U.S. equity markets based on a market index. Under normal circumstances, the fund invests at least 80% of its assets in equity securities of its benchmark index, the Russell 3000® Index.	Index Strategy, Issuer, Large-Capitalization Companies, Liquidity, Market, Mid-Capitalization Company, Non-Diversification, Small-Capitalization Company
Nuveen Small-Cap Blend Index Option (formerly, TIAA-CREF Small-Cap Blend Index Option)	Through its investments in Nuveen Small-Cap Blend Index (formerly, TIAA-CREF Small-Cap Blend Index Fund) (an index fund) (advised by Teachers Advisors LLC.), the Option seeks a favorable long-term total return, mainly through capital appreciation, by investing primarily in a	Index Strategy, Issuer, Illiquid Investments, Market, Non-Diversification, Small-Capitalization Company

Single Fund Options	Investment Strategies	Principal Investment Risks
	<p>portfolio of equity securities in smaller domestic companies based on a market index. Under normal circumstances, the fund invests at least 80% of its assets in securities included in its benchmark index, the Russell 2000® Index.</p>	
<p>TIAA-CREF Principal Protection Option</p>	<p>Through its investments in TIAA-CREF Principal Plus Interest Portfolio (advised by Teachers Advisors LLC), the Option seeks to preserve capital and provide a stable return. The assets in this portfolio are allocated to a funding agreement issued by TIAA-CREF Life, which is an affiliate of TFI, to the Trust as the policyholder on behalf of the Tomorrow's Scholar® 529 Plan. The funding agreement provides a minimum guaranteed rate of return on the amounts allocated to it by the Option. The minimum effective annual interest rate will be neither less than 1% nor greater than 3% at any time. The guarantee is made by the insurance company to the policyholder, not to Account Owners. In addition to the guaranteed rate of interest to the policyholder, the funding agreement allows for the possibility that additional interest may be credited as declared periodically by TIAA-CREF Life. The rate of any additional interest is declared in advance for a period of up to 12 months and is not guaranteed for any future periods. The current effective annual interest rate applicable to the funding agreement will be posted on the Tomorrow's Scholar® 529 Plan's website.</p>	<p>The portfolio is primarily subject to the risk that TIAA-CREF Life could fail to perform its obligations under the funding agreement for financial or other reasons.</p>
<p>Voya Corporate Leaders® 100 Option</p>	<p>Through its investments in Voya Corporate Leaders® 100 Fund (sub-advised by Voya Investment Management Co. LLC), the Option seeks to outperform the S&P 500® Index. Under normal market conditions, the fund invests primarily in equity securities of issuers included in the Standard & Poor's 100 Index.</p>	<p>Company, Convertible Securities, Credit, Derivative Instruments, Interest Rate, Investment Model, Market, Market Capitalization, Market Disruption and Geopolitical, Other Investment Companies, Preferred Stocks, Real Estate Companies and Real Estate Investment Trusts, Securities Lending</p>
<p>Voya GNMA Income Option</p>	<p>Through its investments in Voya GNMA Income Fund (sub-advised by Voya Investment Management Co. LLC), the Option seeks a high level of current income consistent with liquidity and safety of principal through investment primarily in Government National Mortgage Association ("GNMA") mortgage-backed securities (also known as GNMA Certificates) that are guaranteed as to the timely payment of principal and interest by the U.S. government. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in GNMA Certificates.</p>	<p>Credit, Derivative Instruments, Environmental, Social, and Governance, Interest Rate, Liquidity, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Other Investment Companies, Portfolio Turnover Prepayment and Extension, Repurchase Agreements, Securities Lending, U.S. Government Securities and Obligations, When Issued, and Delayed Delivery Securities and Forward Commitments</p>
<p>Voya High Yield Bond Option</p>	<p>Through its investments in Voya High Yield Bond Fund (sub-advised by Voya Investment Management Co. LLC), the Option seeks a high level of current income and total return. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in a diversified portfolio of high-yield (high risk) bonds commonly known as "junk bonds." ..</p>	<p>Bank Instruments, Company, Credit, Credit Default Swaps, Currency, Derivative Instruments, Environmental, Social, and Governance, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, High-Yield Securities, Interest in Loans, Interest Rate, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Other Investment Companies, Preferred Stocks, Prepayment and Extension, Securities Lending, U.S. Government Securities and Obligations, Zero-Coupon Bonds and Pay-in Kind Securities</p>
<p>Voya Intermediate Bond Option</p>	<p>Through its investments in Voya Intermediate Bond Fund (sub-advised by Voya Investment Management Co. LLC), the Option seeks to</p>	<p>Bank Instruments, Company, Credit, Credit Default Swaps, Currency, Derivative Instruments, Environmental, Social, and Governance, Floating Rate Loans, Foreign (Non-U.S.)</p>

Single Fund Options	Investment Strategies	Principal Investment Risks
	<p>maximize total return through income and capital appreciation. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in a portfolio of bonds, including but not limited to corporate, government and mortgage bonds, which, at the time of purchase, are rated investment-grade (e.g., rated at least BBB- by S&P Global Ratings or Baa3 by Moody's Investors Service, Inc.) or have an equivalent rating by national recognized statistical rating organization, or are of comparable quality if unrated.</p>	<p>Investments/Developing and Emerging Markets, High-Yield Securities, Interest in Loans, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mortgage- and/or Asset-Backed Securities, Municipal Obligations, Other Investment Companies, Preferred Stocks, Prepayment and Extension, Securities Lending, U.S. Government Securities and Obligations</p>
<p>Voya Large Cap Growth Option</p>	<p>Through its investments in Voya Large-Cap Growth Fund (sub-advised by Voya Investment Management Co. LLC), the Option seeks long-term capital appreciation. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in common stocks of large-capitalization companies.</p>	<p>Company, Currency, Derivative Instruments, Environmental, Social and, Governance, Foreign (Non-U.S.) Investments, Growth Investing, Investment Model, Issuer Non-Diversification, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Other Investment Companies, Real Estate Companies and Real Estate Investment Trusts, Securities Lending</p>
<p>Voya Large Cap Value Option</p>	<p>Through its investments in Voya Large Cap Value Fund (sub-advised by Voya Investment Management Co. LLC), the Option seeks long-term growth of capital and current income. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in equity securities of dividend-paying, large-capitalization issuers.</p>	<p>Company, Convertible Securities, Credit, Currency, Dividend, Environment, Social, and Governance, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Interest Rate, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Mid-Capitalization Company, Other Investment Companies, Preferred Stocks, Real Estate Companies and Real Estate Investment Trusts, Securities Lending, Small-Capitalization Company, Value Investing</p>
<p>Voya Mid Cap Opportunities Option</p>	<p>Through its investments in Voya MidCap Opportunities Fund (sub-advised by Voya Investment Management Co. LLC), the Option seeks long-term capital appreciation. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in common stocks of mid-sized U.S. companies.</p>	<p>Company, Currency, Derivative Instruments, Environmental, Social, and Governance, Foreign (Non-U.S.) Investments, Growth Investing, Investment Model, Liquidity, Market, Market Disruption and Geopolitical, Mid-Capitalization Company, Other Investment Companies, Real Estate Companies and Real Estate Investment Trusts, Securities Lending, Value Investing</p>
<p>Voya Multi-Manager International Equity Option</p>	<p>Through its investments in Voya Multi-Manager International Equity Fund (sub-advised by Acadian Asset Management LLC, Lazard Asset Management LLC, Voya Investment Management Co. LLC and Voya Investment Management (UK) Limited (together, Voya IM), and Wellington Management Company LLP), the Option seeks long-term growth of capital. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in equity securities. The fund invests at least 65% of its assets in equity securities of companies organized under the laws of, or with principal offices located in, a number of different countries outside of the United States, including companies in countries in emerging markets.</p>	<p>China Investing Risks, Company, Currency, Derivative Instruments, Environmental, Social, and Governance, Foreign (Non-U.S.) Investments/Developing and Emerging Markets, Growth Investing, Initial Public Offerings, Investment Model, Liquidity, Market, Market Capitalization, Market Disruption and Geopolitical, Other Investment Companies, Preferred Stocks, Real Estate Companies and Real Estate Investment Trusts, Securities Lending, Value Investing</p>
<p>Voya Multi-Manager Mid Cap Value Option</p>	<p>Through its investments in Voya Multi-Manager Mid Cap Value Fund (sub-advised by Victory Capital Management Inc. and Voya Investment Management Co. LLC), the Option seeks long-term capital appreciation. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in common stocks of mid-capitalization companies.</p>	<p>Company, Currency, Derivative Instruments, Environmental, Social, and Governance, Focused Investing (Index), Foreign (Non-U.S.) Investments, Index Strategy, Investment Model, Liquidity, Market, Market Disruption and Geopolitical, Mid-Capitalization Company, Other Investment Companies, Real Estate Companies and Real Estate Investment Trusts, Securities Lending, Value Investing</p>
<p>Voya Small Cap Growth Option</p>	<p>Through its investments in Voya Small Cap Growth Fund (sub-advised by Voya Investment</p>	<p>Company, Currency, Environmental, Social, and Governance, Focused Investing, Foreign (Non-U.S.) Investments/Developing and</p>

Single Fund Options	Investment Strategies	Principal Investment Risks
	<p>Management Co. LLC), the Option seeks long-term capital appreciation. Under normal market conditions, the fund invests at least 80% of its net assets (plus borrowings for investment purposes) in stocks of small-capitalization companies.</p>	<p>Emerging Markets, Growth Investing, Investment Model, Liquidity, Market, Market Disruption and Geopolitical, Other Investment Companies, Securities Lending, Small-Capitalization Company</p>

APPENDIX B: ALLOCATIONS TO UNDERLYING FUNDS – EFFECTIVE MAY 7, 2026

The following table includes each Option’s investment allocation among the Underlying Funds as of May 7, 2026. For more information about an Underlying Fund, please see the Underlying Fund’s prospectus and statement of additional information. You may obtain copies of the Voya and VY® Underlying Funds’ prospectuses, statements of additional information, and most recent semi-annual and annual shareholder reports by calling the Program Manager at 1-800-774-5127. To obtain such documents for the BlackRock Global Allocation Fund you may call 1-800-441-7762 or go to <https://www.blackrock.com/us/individual/resources/regulatory-documents/mutual-funds>, for American Century Small Cap Value Fund you may call 1-800-345-6488 or go to <https://americancentury.prospectus-express.com/summary.asp?doctype=pros&clientid=amercentll&fundid=025076852>, for the Fidelity Funds you may call 1-800-544-8544 or go to <https://fundresearch.fidelity.com/fund-screener/>, and for the Nuveen Funds you may call 1-800-223-1200 or go to <http://www.tiaa.org/public/prospectuses>.

Underlying Fund		Vanguard Mega Cap Growth Index Fund	Voya High Yield Portfolio	Voya Inflation Protected Bond Plus Portfolio	Voya Intermediate Bond Fund	Voya International Index Portfolio	Voya Large Cap Value Fund	Voya Limited Maturity Bond Portfolio	Voya MI Dynamic Small Cap Fund (formerly, Voya Small Company Fund)	Voya Multi-Manager Emerging Markets Equity Fund	Voya Multi-Manager International Equity Fund	Voya Small Cap Growth Fund	Voya U.S. Stock Index Portfolio	VY® BrandwyneGLOBAL – Bond Portfolio	VY® T. Rowe Price Capital Appreciation Portfolio
Static Allocation Option															
Voya 529 Aggressive Growth Option	%	4.0	2.0	-	8.0	18.0	4.0	-	3.0	5.0	6.0	2.0	48.0	-	-
Voya 529 Balanced Option	%	4.0	4.0	3.0	19.5	15.5	4.0	3.0	-	4.0	4.0	-	29.0	5.0	5.0
Voya 529 Conservative Plus Option	%	3.0	5.0	3.0	28.0	10.5	3.0	9.0	-	3.0	3.0	-	21.5	6.0	5.0
Voya 529 Growth Plus Option	%	4.0	4.0	-	13.0	18.0	4.0	-	2.0	4.0	6.0	1.0	36.0	3.0	5.0
Voya 529 Ultra Conservative Option	%	-	5.0	8.0	57.0	-	-	12.0	-	-	-	-	2.0	11.0	5.0
Age-Based Option															
Voya 529 Age 0-4 Option	%	4.0	2.0	-	6.0	21.0	4.0	-	3.0	4.0	6.0	2.0	41.0	2.0	5.0
Voya 529 Age 5-8 Option	%	4.0	2.0	-	18.0	16.0	4.0	-	3.0	3.0	5.0	2.0	34.0	4.0	5.0
Voya 529 Age 9-10 Option	%	4.0	3.0	2.0	24.0	13.0	4.0	2.0	2.0	3.0	5.0	1.0	27.0	5.0	5.0
Voya 529 Age 11-12 Option	%	4.0	4.0	3.0	26.0	10.0	4.0	7.0	1.0	3.0	5.0	1.0	22.0	5.0	5.0
Voya 529 Age 13-14 Option	%	3.0	4.0	4.0	29.0	9.0	3.0	11.0	-	3.0	3.0	-	19.0	7.0	5.0
Voya 529 Age 15 Option	%	3.0	4.0	5.0	29.0	6.0	3.0	20.0	-	2.0	2.0	-	14.0	7.0	5.0
Voya 529 Age 16 Option	%	3.0	4.0	6.0	30.0	6.0	3.0	20.0	-	2.0	2.0	-	12.0	7.0	5.0
Voya 529 Age 17 Option	%	2.0	4.0	6.0	30.0	3.0	2.0	30.0	-	2.0	2.0	-	7.0	7.0	5.0
Voya 529 Age 18+ Option	%	-	5.0	9.0	20.0	2.0	-	48.0	-	-	-	-	7.0	4.0	5.0

		American Century Small Cap Value Fund	BlackRock Global Allocation Fund	Fidelity Global ex U.S. Index Fund	Fidelity U.S. Bond Index Fund	Nuveen Bond Index Fund	Nuveen Equity Index Fund	Nuveen Small-Cap Blend Index Fund	TIAA-CREF Principal Plus Interest Portfolio	Voya Corporate Leaders® 100 Fund	Voya GNMA Income Fund	Voya High-Yield Bond Fund	Voya Intermediate Bond Fund	Voya Large-Cap Growth Fund	Voya Large Cap Value Fund	Voya MidCap Opportunities Fund	Voya Multi-Manager International Equity Fund	Voya Multi-Manager Mid Cap Value Fund	Voya Small Cap Growth Fund	
Underlying Fund																				
Single Fund Option																				
American Century Small Cap Value Option	%	100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
BlackRock Global Allocation Option	%	-	100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fidelity Global ex-US Index Option	%	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fidelity U.S. Bond Index Option	%	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuveen Balanced Option	%	-	-	-	-	35.0	65.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuveen Equity Index Option	%	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-	-
Nuveen Small-Cap Blend Index Option	%	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-	-
TIAA-CREF Principal Protection Option	%	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-	-
Voya Corporate Leaders® 100 Option	%	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-	-
Voya GNMA Income Option	%	-	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-	-
Voya High Yield Bond Option	%	-	-	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-	-
Voya Intermediate Bond Option	%	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-	-
Voya Large Cap Growth Option	%	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-	-	-	-
Voya Large Cap Value Option	%	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-	-	-
Voya Mid Cap Opportunities Option	%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-	-
Voya Multi-Manager International Equity Option	%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-
Voya Multi-Manager Mid Cap Value Option	%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-
Voya Small Cap Growth Option	%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100

APPENDIX C: RISKS APPLICABLE TO THE INVESTMENT OPTIONS – EFFECTIVE APRIL 28, 2025

Accounts are subject to a variety of investment risks that will vary depending upon the selected Option(s) and the applicable Underlying Funds. Provided below is a summary of the Underlying Funds' principal investment risks described in "Appendix A: Investment Options." Please note that the information provided below is only a summary of the Underlying Funds' principal investment risks. For more information about the investment risks of the Underlying Funds, please see their respective prospectuses and statements of additional information. You may obtain copies of the Underlying Funds' prospectuses and statements of additional information by calling the Program Manager at 1-800-774-5127.

Asset Allocation: Investment performance depends on the manager's skill in allocating assets among the asset classes in which an Underlying Fund invests and in choosing investments within those asset classes. There is a risk that the manager may allocate assets or investments to or within an asset class that underperforms compared to other asset classes or investments. An Underlying Fund may underperform funds that allocate their assets differently than the Underlying Fund, due to differences in the relative performance of asset classes and subsets of asset classes.

Bank Instruments: Bank instruments include certificates of deposit, fixed time deposits, bankers' acceptances, and other debt and deposit-type obligations issued by banks. Changes in economic, regulatory, or political conditions, or other events that affect the banking industry may have an adverse effect on bank instruments or banking institutions that serve as counterparties in transactions with an Underlying Fund. In the event of a bank insolvency or failure, an Underlying Fund may be considered a general creditor of the bank, and it might lose some or all of the funds deposited with the bank. Even where it is recognized that a bank might be in danger of insolvency or failure, an Underlying Fund might not be able to withdraw or transfer its money from the bank in time to avoid any adverse effects of the insolvency or failure. Volatility in the banking system may impact the viability of banking and financial services institutions. In the event of failure of any of the financial institutions where an Underlying Fund maintains its cash and cash equivalents, there can be no assurance that the Underlying Fund would be able to access uninsured funds in a timely manner or at all and the Underlying Fund may incur losses. Any such event could adversely affect the business, liquidity, financial position and performance of the Underlying Fund.

Borrowing: Borrowing creates leverage, which may increase expenses and increase the impact of an Underlying Fund's other risks. Borrowing may exaggerate any increase or decrease in an Underlying Fund's net asset value causing an Underlying Fund to be more volatile than a fund that does not borrow. Borrowing for investment purposes is considered to be speculative and may result in losses to an Underlying Fund.

Call: The risk that, during periods of falling interest rates, an issuer may call (or repay) a fixed-income security prior to maturity, resulting in a decline in an Underlying Fund's income.

China Investing Risks: The Chinese economy is generally considered an emerging and volatile market. Although China has experienced a relatively stable political environment in recent years, there is no guarantee that such stability will be maintained in the future. Significant portions of the Chinese securities markets may become rapidly illiquid because Chinese issuers have the ability to suspend the trading of their equity securities under certain circumstances, and have shown a willingness to exercise that option in response to market volatility, epidemics, pandemics, adverse economic, market or political events, and other events. Political, regulatory and diplomatic events, such as the U.S.-China "trade war" that intensified in 2018, could have an adverse effect on the Chinese or Hong Kong economies and on related investments. In addition, U.S. or foreign government restrictions on investments in Chinese companies or other intervention could negatively affect the implementation of an Underlying Fund's investment strategies, such as by precluding the Fund from making certain investments or causing the Fund to sell investments at disadvantageous times.

- **Investing through Stock Connect:** Shares in mainland China-based companies that trade on Chinese stock exchanges such as the Shanghai Stock Exchange and the Shenzhen Stock Exchange ("China A-Shares") may be purchased directly or indirectly through the Shanghai-Hong Kong Stock Connect ("Stock Connect"), a mutual market access program designed to, among other things, enable foreign investment in the People's Republic of China ("PRC") via brokers in Hong Kong. There are significant risks inherent in investing in China A-Shares through Stock Connect. The underdeveloped state of PRC's investment and banking systems subjects the settlement, clearing, and registration of China A-Shares transactions to heightened risks. Stock Connect can only operate when both PRC and Hong Kong markets are open for trading and when banking services are available in both markets on the corresponding settlement days. As such, if either or both markets are closed on a U.S. trading day, an Underlying Fund may not be able to dispose of its China A-Shares in a timely manner, which could adversely affect the Fund's performance.
- **Variable Interest Entities:** Many Chinese companies use a structure known as a variable interest entity (a "VIE") to address Chinese restrictions on direct foreign investment in Chinese companies operating in certain sectors. An Underlying Fund's investment exposure to VIEs may pose additional risks because the Fund's investment is not made directly in the VIE (the actual Chinese operating company), but rather in a holding company domiciled outside of China (a "Holding Company") whose interests in the business of the underlying Chinese operating company (the VIE) are established through contracts rather than through equity ownership. The VIE (which an Underlying Fund is restricted from owning under Chinese law) is generally owned by Chinese nationals, and the Holding Company (in which an Underlying Fund invests) holds only contractual rights (rather than equity ownership) relating to the VIE, typically including a contractual claim on the VIE's profits. Shares of the Holding Company, in turn, are traded on exchanges outside of China and are available to non-Chinese investors such as an Underlying Fund. While the VIE structure is a longstanding practice in China, until recently, such arrangements had not been formally recognized under Chinese law. However, in late 2021, the Chinese government signaled its interest in implementing filing requirement rules that would both affirm the legality of VIE structures and regulate them. How these filing requirements will operate in practice, and what will be required for approval, remains unclear. While there is optimism that these actions will reduce uncertainty over Chinese actions on VIEs, there is also caution given how unresolved the process is. Until these rules are finalized, and potentially afterwards depending on how they are implemented, there remains significant uncertainty associated with VIE investments.

There is a risk that the Chinese government may cease to tolerate VIE structures at any time or impose new restrictions on the structure, in each case either generally or with respect to specific issuers. In such a scenario, the Chinese operating company could be subject to penalties, including revocation of its business and operating license, or the Holding Company could forfeit its interest in the business of the Chinese operating company. Further, in case of a dispute between the Holding Company investors and the Chinese owners of the VIE, the Holding Company's contractual claims with respect to the VIE may be unenforceable in

China, thus limiting the remedies and rights of Holding Company investors such as an Underlying Fund. Control over a VIE may also be jeopardized if a natural person who holds the equity interest in the VIE breaches the terms of the contractual arrangements, is subject to legal proceedings, or if any physical instruments or property of the VIE, such as seals, business registration certificates, financial data and licensing arrangements (sometimes referred to as “chops”), are used without authorization. In the event of such an occurrence, an Underlying Fund, as a foreign investor, may have little or no legal recourse. Such legal uncertainty may be exploited against the interests of the Holding Company investors such as an Underlying Fund.

An Underlying Fund will typically have little or no ability to influence the VIE through proxy voting or other means because it is not a VIE owner/shareholder. Foreign (non-U.S.) companies listed on U.S. stock exchanges, including companies using the VIE structure, could also face delisting or other ramifications for failure to meet the expectations and/or requirements of the SEC, the Public Company Accounting Oversight Board, or other U.S. regulators. Any of these risks could reduce the liquidity and value of an Underlying Fund’s investments in Holding Companies or render them valueless.

Collateralized Loan Obligations and Other Collateralized Obligations: A collateralized loan obligation (“CLO”) is an obligation of a trust or other special purpose vehicle typically collateralized by a pool of loans, which may include senior secured and unsecured loans and subordinate corporate loans, including loans that may be rated below investment grade, or equivalent unrated loans. CLOs may incur management fees and administration fees. The risks of investing in a CLO depend largely on the type of the collateral held in the CLO portfolio and the tranche of securities in which an Underlying Fund may invest, and can generally be summarized as a combination of economic risks of the underlying loans combined with the risks associated with the CLO structure governing the priority of payments, and include interest rate risk, credit risk, liquidity risk, prepayment and extension risk, and the risk of default of the underlying asset, among others.

Commodities Related Investments: Exposure to the commodities markets may subject the Fund to greater volatility than investments in traditional securities. The value of commodity-linked derivative investments may be affected by changes in overall market movements, commodity index volatility, changes in inflation, interest rates, or factors affecting a particular industry or commodity, such as drought, floods, weather, embargoes, tariffs and international economic, political and regulatory developments.

Company: The price of a company’s stock could decline or underperform for many reasons including, among others, poor management, financial problems, reduced demand for the company’s goods or services, regulatory fines and judgments, or business challenges. If a company is unable to meet its financial obligations, declares bankruptcy, or becomes insolvent, its stock could become worthless.

Concentration (Index): To the extent that an Underlying Fund’s index “concentrates,” as that term is defined in the 1940 Act, in the securities of a particular industry or group of industries, the Underlying Fund may allocate its investments to approximately the same extent as the index. As a result, an Underlying Fund may be more sensitive to financial economic, business, political, regulatory, and other developments and conditions, including natural or other disasters, affecting issuers in a particular industry or group of industries, and if securities of such industry or group of industries fall out of favor, the Underlying Fund could underperform, or be more volatile than, a fund that is more broadly invested across industries.

Convertible Securities: Convertible securities are securities that are convertible into or exercisable for common stocks at a stated price or rate. Convertible securities are subject to the usual risks associated with debt instruments, such as interest rate risk and credit risk. In addition, because convertible securities react to changes in the value of the underlying stock, they are subject to market risk.

Corporate Loans: Commercial banks and other financial institutions or institutional investors make corporate loans to companies that need capital to grow or restructure. Borrowers generally pay interest on corporate loans at rates that change in response to changes in market interest rates such as the Secured Overnight Financing Rate (“SOFR”) or the prime rates of U.S. banks. As a result, the value of corporate loan investments is generally less exposed to the adverse effects of shifts in market interest rates than investments that pay a fixed rate of interest. The market for corporate loans may be subject to irregular trading activity and wide bid/ask spreads. In addition, transactions in corporate loans may settle on a delayed basis. As a result, the proceeds from the sale of corporate loans may not be readily available to make additional investments or to meet the Underlying Fund’s redemption obligations. To the extent the extended settlement process gives rise to short-term liquidity needs, the Underlying Fund may hold additional cash, sell investments, or temporarily borrow from banks and other lenders.

Covenant-Lite Loans: Loans in which an Underlying Fund may invest or to which an Underlying Fund may gain exposure indirectly through its investments in collateralized debt obligations, CLOs or other types of structured securities may be considered “covenant-lite” loans. Covenant-lite refers to loans which do not incorporate traditional performance-based financial maintenance covenants. Covenant-lite does not refer to a loan’s seniority in a borrower’s capital structure nor to a lack of the benefit from a legal pledge of the borrower’s assets and does not necessarily correlate to the overall credit quality of the borrower. Covenant-lite loans generally do not include terms which allow a lender to take action based on a borrower’s performance relative to its covenants. Such actions may include the ability to renegotiate and/or re-set the credit spread on the loan with a borrower, and even to declare a default or force the borrower into bankruptcy restructuring if certain criteria are breached. Covenant-lite loans typically still provide lenders with other covenants that restrict a borrower from incurring additional debt or engaging in certain actions. Such covenants can only be breached by an affirmative action of the borrower, rather than by a deterioration in the borrower’s financial condition. Accordingly, an Underlying Fund may have fewer rights against a borrower when it invests in, or has exposure to, covenant-lite loans and, accordingly, may have a greater risk of loss on such investments as compared to investments in, or exposure to, loans with additional or more conventional covenants.

Credit: An Underlying Fund could lose money if the issuer or guarantor of a debt instrument in which the Underlying Fund invests, or the counterparty to a derivative contract the Underlying Fund entered into, is unable or unwilling, or is perceived (whether by market participants, rating agencies, pricing services, or otherwise) as unable or unwilling, to meet its financial obligations.

Credit Default Swaps: An Underlying Fund may enter into credit default swaps, either as a buyer or a seller of the swap. A buyer of a credit default swap is generally obligated to pay the seller an upfront or a periodic stream of payments over the term of the contract until a credit event, such as a default, on a reference obligation has occurred. If a credit event occurs, the seller generally must pay the buyer the “par value” (full notional value) of the swap in exchange for an equal face amount of deliverable obligations of the reference entity described in the swap, or the seller may be required to deliver the related net cash amount if the swap is cash settled. As a seller of a credit default swap, the Underlying Fund would effectively add leverage to its portfolio because, in addition to its total net assets, the Underlying Fund would be subject to investment exposure on the full notional value of the swap. Credit default swaps are particularly subject to counterparty, credit, valuation, liquidity, and leveraging risks and the risk that the swap may not correlate with its reference obligation as expected. Certain standardized credit default swaps

are subject to mandatory central clearing. Central clearing is expected to reduce counterparty credit risk and increase liquidity; however, there is no assurance that it will achieve that result, and, in the meantime, central clearing and related requirements expose the Underlying Fund to different kinds of costs and risks. In addition, credit default swaps expose the Underlying Fund to the risk of improper valuation.

Credit Spread: The risk that credit spreads (i.e., the difference in yield between securities that is due to differences in each security's respective credit quality) may increase when market participants believe that bonds generally have a greater risk of default, which could result in a decline in the market values of the Underlying Fund's debt securities.

Currency: To the extent that an Underlying Fund invests directly or indirectly in foreign (non-U.S.) currencies or in securities denominated in, or that trade in, foreign (non-U.S.) currencies, it is subject to the risk that those foreign (non-U.S.) currencies will decline in value relative to the U.S. dollar or, in the case of hedging positions, that the U.S. dollar will decline in value relative to the currency being hedged by an Underlying Fund through foreign currency exchange transactions.

Debt Securities: Debt securities, such as bonds, involve interest rate risk, credit risk, extension risk, and prepayment risk, among other things.

- **Interest Rate Risk** — The market value of bonds and other fixed-income securities changes in response to interest rate changes and other factors. Interest rate risk is the risk that prices of bonds and other fixed-income securities will increase as interest rates fall and decrease as interest rates rise. The Underlying Fund may be subject to a greater risk of rising interest rates due to the recent period of historically low interest rates. For example, if interest rates increase by 1%, assuming a current portfolio duration of ten years, and all other factors being equal, the value of the Underlying Fund's investments would be expected to decrease by 10%. (Duration is a measure of the price sensitivity of a debt security or portfolio of debt securities to relative changes in interest rates.) The magnitude of these fluctuations in the market price of bonds and other fixed-income securities is generally greater for those securities with longer maturities. Fluctuations in the market price of the Underlying Fund's investments will not affect interest income derived from instruments already owned by the Underlying Fund, but will be reflected in the Underlying Fund's net asset value. The Underlying Fund may lose money if short-term or long-term interest rates rise sharply in a manner not anticipated by Underlying Fund management. To the extent the Underlying Fund invests in debt securities that may be prepaid at the option of the obligor (such as mortgage-backed securities), the sensitivity of such securities to changes in interest rates may increase (to the detriment of the Underlying Fund) when interest rates rise. Moreover, because rates on certain floating rate debt securities typically reset only periodically, changes in prevailing interest rates (and particularly sudden and significant changes) can be expected to cause some fluctuations in the net asset value of the Underlying Fund to the extent that it invests in floating rate debt securities. These basic principles of bond prices also apply to U.S. Government securities. A security backed by the "full faith and credit" of the U.S. Government is guaranteed only as to its stated interest rate and face value at maturity, not its current market price. Just like other fixed-income securities, government-guaranteed securities will fluctuate in value when interest rates change. A general rise in interest rates has the potential to cause investors to move out of fixed-income securities on a large scale, which may increase redemptions from funds that hold large amounts of fixed-income securities. Heavy redemptions could cause the Underlying Fund to sell assets at inopportune times or at a loss or depressed value and could hurt the Underlying Fund's performance.
- **Credit Risk** — Credit risk refers to the possibility that the issuer of a debt security (i.e., the borrower) will not be able to make payments of interest and principal when due. Changes in an issuer's credit rating or the market's perception of an issuer's creditworthiness may also affect the value of the Underlying Fund's investment in that issuer. The degree of credit risk depends on both the financial condition of the issuer and the terms of the obligation.
- **Extension Risk** — When interest rates rise, certain obligations will be paid off by the obligor more slowly than anticipated, causing the value of these obligations to fall.
Prepayment Risk — When interest rates fall, certain obligations will be paid off by the obligor more quickly than originally anticipated, and the Underlying Fund may have to invest the proceeds in securities with lower yields.

Deflation: Deflation occurs when prices throughout the economy decline over time - the opposite of inflation. Unless repayment of the original bond principal upon maturity (as adjusted for inflation) is guaranteed, when there is deflation, the principal and income of an inflation-protected bond will decline and could result in losses.

Derivative Instruments: Derivative instruments are subject to a number of risks, including the risk of changes in the market price of the underlying assets, reference rate, or index credit risk with respect to the counterparty, risk of loss due to changes in market interest rates, liquidity risk, valuation risk, and volatility risk. The amounts required to purchase certain derivatives may be small relative to the magnitude of exposure assumed by an Underlying Fund. Therefore, the purchase of certain derivatives may have an economic leveraging effect on an Underlying Fund and exaggerate any increase or decrease in the net asset value. Derivatives may not perform as expected, so an Underlying Fund may not realize the intended benefits. When used for hedging purposes, the change in value of a derivative may not correlate as expected with the asset, reference rate, or index being hedged. When used as an alternative or substitute for direct cash investment, the return provided by the derivative may not provide the same return as direct cash investment.

Distressed Securities: Distressed securities are speculative and involve substantial risks in addition to the risks of investing in junk bonds. The Underlying Fund will generally not receive interest payments on the distressed securities and may incur costs to protect its investment. In addition, distressed securities involve the substantial risk that principal will not be repaid. These securities may present a substantial risk of default or may be in default at the time of investment. The Underlying Fund may incur additional expenses to the extent it is required to seek recovery upon a default in the payment of principal or interest on its portfolio holdings. In any reorganization or liquidation proceeding relating to a portfolio company, the Underlying Fund may lose its entire investment or may be required to accept cash or securities with a value less than its original investment. Distressed securities and any securities received in an exchange for such securities may be subject to restrictions on resale.

Dividend: Companies that issue dividend yielding equity securities are not required to continue to pay dividends on such securities. Therefore, there is the possibility that such companies could reduce or eliminate the payment of dividends in the future. As a result, an Underlying Fund's ability to execute its investment strategy may be limited.

Downgrade: The risk that securities are subsequently downgraded should an Underlying Fund's investment adviser and/or rating agencies believe the issuer's business outlook or creditworthiness has deteriorated.

Environmental, Social, and Governance: The sub-adviser's consideration of ESG factors in selecting investments for an Underlying Fund is based on information that is not standardized, some of which can be qualitative and subjective by nature. The sub-adviser's assessment of ESG factors in respect of a company or obligations of an issuer may rely on third party data that might be incorrect or based on incomplete or inaccurate information. There is no minimum percentage of an Underlying Fund's assets that will be invested in companies or obligations of issuers that the sub-adviser views favorably in light of ESG factors, and the sub-adviser may choose not to invest in companies or obligations of issuers that compare favorably to other companies on the basis of ESG factors. It is possible that an Underlying Fund will have less exposure to certain companies or obligations of certain issuers due to the sub-adviser's assessment of ESG factors than other comparable mutual funds. There can be no assurance that an investment selected by the sub-adviser, which includes its consideration of ESG factors, will provide more favorable investment performance than another potential investment, and such an investment may, in fact, underperform other potential investments. The sub-adviser's consideration of ESG factors in selecting investments for the Underlying Fund may cause it to forego other favorable investments that other investors who do not consider similar factors or who evaluate them differently might select. This may cause the Underlying Fund to underperform the stock market or relevant benchmark as a whole or other funds that do not consider ESG factors or that use such factors differently.

For Underlying Funds that operate as multi-manager funds, ESG risk is the risk that the investment adviser's consideration of ESG factors in selecting sub-advisers for an Underlying Fund is based on information that is not standardized, some of which can be qualitative and subjective by nature. There is no minimum percentage of an Underlying Fund's assets that will be allocated to sub-advisers that consider ESG factors as part of their investment processes, and the investment adviser may choose to select sub-advisers that do not consider ESG factors as part of their investment processes. It is possible that an Underlying Fund will have less exposure to ESG-focused strategies than other comparable mutual funds. There can be no assurance that a sub-adviser selected by the investment adviser, which includes its consideration of ESG factors, will provide more favorable investment performance than another potential sub-adviser, and such a sub-adviser may, in fact, underperform other potential sub-advisers.

Fixed-Income Foreign Investment: Investment in fixed-income securities or financial instruments of foreign issuers involves increased risks due to adverse issuer, political, regulatory, currency, market, or economic developments. These developments may impact the ability of a foreign debt issuer to make timely and ultimate payments on its debt obligations to a fund or impair a fund's ability to enforce its rights against the foreign debt issuer. These risks are heightened in emerging or developing markets. Foreign investments may also have lower overall liquidity and be more difficult to value than investments in U.S. issuers

Floating Rate Loans: In the event a borrower fails to pay scheduled interest or principal payments on a floating rate loan (which can include certain bank loans), an Underlying Fund will experience a reduction in its income and a decline in the market value of such floating rate loan. If a floating rate loan is held by an Underlying Fund through another financial institution, or an Underlying Fund relies upon another financial institution to administer the loan, the receipt of scheduled interest or principal payments may be subject to the credit risk of such financial institution. Investors in floating rate loans may not be afforded the protections of the anti-fraud provisions of the Securities Act of 1933, as amended, and the Securities Exchange Act of 1934, as amended, because loans may not be considered "securities" under such laws. Additionally, the value of collateral, if any, securing a floating rate loan can decline or may be insufficient to meet the borrower's obligations under the loan, and such collateral may be difficult to liquidate. No active trading market may exist for many floating rate loans and many floating rate loans are subject to restrictions on resale. Transactions in loans typically settle on a delayed basis and may take longer than 7 days to settle. As a result, an Underlying Fund may not receive the proceeds from a sale of a floating rate loan for a significant period of time. Delay in the receipts of settlement proceeds may impair the ability of an Underlying Fund to meet its redemption obligations, and may limit the ability of an Underlying Fund to repay debt, pay dividends, or to take advantage of new investment opportunities.

Focused Investing: To the extent that an Underlying Fund invests a substantial portion of its assets in securities of a particular industry, sector, market segment, or geographic area, an Underlying Fund may be more sensitive to financial, economic, business, political, regulatory, and other developments and conditions, including natural or other disasters, affecting issuers in a particular industry, sector, market segment, or geographic area in which an Underlying Fund focuses its investments, and if securities of such industry, sector, market segment, or geographic area fall out of favor, an Underlying Fund could underperform, or be more volatile than, a fund that has greater diversification.

- **Health Care Sector:** Investments in companies involved in the health care sector are strongly affected by worldwide scientific or technological developments. Products sold by companies in the health care sector may rapidly become obsolete and are also often dependent on access to resources and the company's ability to receive patents from regulatory agencies. Many health care companies also are subject to significant government regulation and may be affected by changes in governmental policies. As a result, investments in health care companies include the risk that the economic prospects, and the share prices, of such companies can fluctuate dramatically.
- **Technology Sector:** Investments in companies involved in the technology sector are subject to significant competitive pressures, such as aggressive pricing of products or services, new market entrants, competition for market share, short product cycles due to an accelerated rate of technological developments, evolving industry standards, changing customer demands, and the potential for limited earnings and/or falling profit margins. The failure of a company to adapt to such changes could have a material adverse effect on the company's business, results of operations, and financial condition. These companies also face the risks that new services, equipment, or technologies will not be accepted by consumers and businesses or will become rapidly obsolete. These factors can affect the profitability of these companies and, as a result, the values of their securities. Many companies involved in the technology sector have limited operating histories, and prices of these companies' securities historically have been more volatile than those of many other companies' securities, especially over the short term.

Focused Investing (Index): To the extent that an Underlying Fund's benchmark or other index is substantially composed of securities in a particular industry, sector, market segment, or geographic area, an Underlying Fund may allocate its investments to approximately the same extent as the index as part of its investment strategy. As a result, an Underlying Fund may be more sensitive to financial, economic, business, political, regulatory, and other developments and conditions, including natural or other disasters, affecting issuers in a particular industry, sector, market segment, or geographic area in which an Underlying Fund focuses its investments, and if securities of such industry, sector, market segment, or geographic area fall out of favor, an Underlying Fund could underperform, or be more volatile than, a fund that has greater diversification.

- **Energy Sector:** Investments in companies in the energy sector are subject to risks related to fluctuations in energy prices, which can be the result of, among other things, geopolitical developments, changes in economic conditions, changes in currency exchange rates, interest rates, developments in energy exploration and production, terrorist acts, and natural disasters. The values of companies in the energy sector can be highly volatile and may be affected by changes in transportation storage, and labor costs, and the development of alternative energy sources and energy conservation activities. These companies are at risk of environmental damage claims and other potential civil liabilities.
- **Financial Services Sector:** Investments in the financial services sector may be subject to credit risk, interest rate risk, and regulatory risk, among others. Banks and other financial institutions can be affected by such factors as downturns in the U.S. and foreign economies and general economic cycles, fiscal and monetary policy (including the effects of changes in interest rates), adverse developments in the real estate market, the deterioration or failure of other financial institutions, and changes in banking or securities regulations.
- **Industrials Sector:** Companies involved in the industrials sector include those whose businesses are dominated by one of the following activities: the manufacture and distribution of capital goods, including aerospace and defense, construction, engineering and building products, electrical equipment, and industrial machinery; the provision of commercial services and supplies, including printing, employment, environmental, and office services; and the provision of transportation services, including airlines, couriers, marine, road and rail, and transportation infrastructure. Companies involved in the industrials sector are affected by changes in the supply and demand for products and services, product obsolescence, claims for environmental damage or product liability, and general economic conditions, among other factors.
- **Materials Sector:** Companies involved in the materials sector includes companies in the following industry groups: forestry and paper, chemicals, industrial metals, and mining. Investments in companies involved in the materials sector may be adversely impacted by changes in commodity prices or exchange rates, depletion of resources, over-production, litigation, and government regulations, among other factors. The chemicals industry may be significantly affected by intense competition, product obsolescence, raw materials prices, and government regulation, and may be subject to risks associated with the production, handling, disposal of hazardous components, and litigation and claims arising out of environmental contamination.
- **Technology Sector:** Investments in companies involved in the technology sector are subject to significant competitive pressures, such as aggressive pricing of products or services, new market entrants, competition for market share, short product cycles due to an accelerated rate of technological developments, evolving industry standards, changing customer demands, and the potential for limited earnings and/or falling profit margins. The failure of a company to adapt to such changes could have a material adverse effect on the company's business, results of operations, and financial condition. These companies also face the risks that new services, equipment, or technologies will not be accepted by consumers and businesses or will become rapidly obsolete. These factors can affect the profitability of these companies and, as a result, the values of their securities. Many companies involved in the technology sector have limited operating histories, and prices of these companies' securities historically have been more volatile than those of many other companies' securities, especially over the short term.

Foreign (Non U.S.) Investments/Developing and Emerging Markets: Investing in foreign (non-U.S.) securities may result in an Underlying Fund experiencing more rapid and extreme changes in value than a fund that invests exclusively in securities of U.S. companies due, in part, to: smaller markets; differing regulatory, accounting, auditing and financial reporting standards and practices; nationalization, expropriation, or confiscatory taxation; foreign currency fluctuations, currency blockage, or replacement; potential for default on sovereign debt; and political changes or diplomatic developments, which may include the imposition of economic sanctions (or the threat of new or modified sanctions) or other measures by the U.S. or other governments and supranational organizations. Markets and economies throughout the world are becoming increasingly interconnected, and conditions or events in one market, country or region may adversely impact investments or issuers in another market, country, or region.

Growth Investing: Prices of growth-oriented stocks are more sensitive to investor perceptions of the issuer's growth potential and may fall quickly and significantly if investors suspect that actual growth may be less than expected. There is a risk that funds that invest in growth-oriented stocks may underperform other funds that invest more broadly. Growth-oriented stocks tend to be more volatile than value-oriented stocks, and may underperform the market as a whole over any given time period.

High Portfolio Turnover: The Underlying Fund may engage in active and frequent trading of its portfolio securities. High portfolio turnover (more than 100%) may result in increased transaction costs to the Underlying Fund, including brokerage commissions, dealer mark-ups and other transaction costs on the sale of the securities and on reinvestment in other securities. The sale of Underlying Fund portfolio securities may result in the realization and/or distribution to shareholders of higher capital gains or losses as compared to a fund with less active trading policies. These effects of higher-than-normal portfolio turnover may adversely affect Underlying Fund performance.

High-Yield Securities: Lower quality securities including securities that are or have fallen below investment grade (commonly referred to as "junk bonds") have greater credit risk and liquidity risk than higher quality (investment grade) securities, and their issuers' long-term ability to make payments is considered speculative. Prices of lower-quality bonds or other debt instruments are also more volatile, are more sensitive to negative news about the economy or the issuer, and have greater liquidity risk and price volatility.

Illiquid Investments Risk: The risk that illiquid investments may be difficult to sell for the value at which they are carried, if at all, or at any price within the desired time frame.

Income Volatility: The risk that the level of current income from a portfolio of fixed-income investments may decline in certain interest rate environments.

Index Strategy: The index selected may underperform the overall market. To the extent that an Underlying Fund (or a portion of the Underlying Fund) seeks to track an index's performance, an Underlying Fund will not use defensive strategies or attempt to reduce its exposure to poor performing securities in the index. To the extent an Underlying Fund's investments track its target index, the Underlying Fund may underperform other funds that invest more broadly. Errors in index data, index computations or the construction of the index in accordance with its methodology may occur from time to time and may not be identified and corrected by the index provider for a period of time or at all, which may have an adverse impact on an Underlying Fund. The correlation between an Underlying Fund's performance and index performance may be affected by an Underlying Fund's expenses and the timing of purchases and redemptions of an Underlying Fund's units. In addition, an Underlying Fund's

actual holdings might not match the index and an Underlying Fund's effective exposure to index securities at any given time may not precisely correlate.

Inflation-Indexed Bonds: If the index measuring inflation falls, the principal value of inflation-indexed bonds will be adjusted downward, and consequently the interest payable on these bonds (calculated with respect to a smaller principal amount) will be reduced. In addition, inflation-indexed bonds are subject to the usual risks associated with debt instruments, such as interest rate and credit risk. Repayment of the original bond principal upon maturity (as adjusted for inflation) is guaranteed in the case of U.S. Treasury inflation-indexed bonds. For bonds that do not provide a similar guarantee, the adjusted principal value of the bond repaid at maturity may be less than the original principal.

Initial Public Offerings: Investments in IPOs and companies that have recently gone public have the potential to produce substantial gains for an Underlying Fund. However, there is no assurance that an Underlying Fund will have access to profitable IPOs or that the IPOs in which an Underlying Fund invests will rise in value. Furthermore, the value of securities of newly public companies may decline in value shortly after the IPO. When an Underlying Fund's asset base is small, the impact of such investments on an Underlying Fund's return will be magnified. If an Underlying Fund's assets grow, it is likely that the effect of an Underlying Fund's investment in IPOs on an Underlying Fund's return will decline.

Interest in Loans: The value and the income streams of interests in loans (including participation interests in lease financings and assignments in secured variable or floating rate loans) will decline if borrowers delay payments or fail to pay altogether. A significant rise in market interest rates could increase this risk. Although loans may be fully collateralized when purchased, such collateral may become illiquid or decline in value.

Interest Rate: A rise in market interest rates generally results in a fall in the value of bonds and other debt instruments; conversely, values generally rise as market interest rates fall. Interest rate risk is generally greater for debt instruments than floating rate instruments. The higher the credit quality of the instrument, and the longer its maturity or duration, the more sensitive it is to changes in market interest rates. Duration is a measure of sensitivity of the price of a debt instrument to a change in interest rate. The U.S. Federal Reserve Board recently lowered interest rates following a period of consistent rate increases. Declining market interest rates increase the likelihood that debt instruments will be pre-paid. Rising market interest rates have unpredictable effects on the markets and may expose debt and related markets to heightened volatility. To the extent that an Underlying Fund invests in debt instruments, an increase in market interest rates may lead to increased redemptions and increased portfolio turnover, which could reduce liquidity for certain investments, adversely affect values, and increase costs. Increased redemptions may cause an Underlying Fund to liquidate portfolio positions when it may not be advantageous to do so and may lower returns. If dealer capacity in debt markets is insufficient for market conditions, it may further inhibit liquidity and increase volatility in debt markets. Fiscal, economic, monetary, or other governmental policies or measures have in the past, and may in the future, cause or exacerbate risks associated with interest rates, including changes in interest rates. Negative or very low interest rates could magnify the risks associated with changes in interest rates. In general, changing interest rates, including rates that fall below zero, could have unpredictable effects on markets and may expose debt and related markets to heightened volatility. In the case of inverse debt instruments, the interest rate paid by the debt instruments is a floating rate, which will generally decrease when the market rate of interest to which the inverse debt instruments are indexed increases and will increase when the market rate of interest to which the inverse debt instruments are indexed decreases. Changes to monetary policy by the Federal Reserve Board or other regulatory actions could expose debt and related markets to heightened volatility, interest rate sensitivity, and reduced liquidity, which may impact an Underlying Fund's operations and return potential.

Investment Model: A Sub-Adviser's proprietary investment model may not adequately take into account existing or unforeseen market factors or the interaction among such factors, including changes in how such factors interact, and there is no guarantee that the use of a proprietary investment model will result in effective investment decisions for an Underlying Fund.

Issuer: The risk that an issuer's earnings prospects and overall financial position will deteriorate, causing a decline in the value of the issuer's financial instruments over short or extended periods of time.

Issuer Non-Diversification: A "non-diversified" investment company is subject to the risks of focusing investments in a small number of issuers, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be. In addition, this increases the risk that a change in the value of any one investment held by an Underlying Fund could affect the overall value of the Underlying Fund more than it would affect that of a diversified fund holding a greater number of investments. Accordingly, the Underlying Fund's value will likely be more volatile than the value of a more diversified fund.

Large-Capitalization Companies: Investments in larger companies may involve certain risks associated with their larger size. For instance, larger companies may be less able to respond quickly to new competitive challenges, such as changes in consumer tastes or innovation from smaller competitors. Also, larger companies are sometimes less able to achieve as high growth rates as successful smaller companies, especially during extended periods of economic expansion.

Leverage: Certain transactions and investment strategies may give rise to leverage. Such transactions and investment strategies include, but are not limited to: borrowing, dollar rolls, reverse repurchase agreements, loans of portfolio securities, short sales, and the use of when-issued, delayed-delivery or forward-commitment transactions. The use of certain derivatives may also increase leveraging risk and, in some cases, adverse changes in the value or level of a derivative's underlying asset, rate, or index may result in potentially unlimited losses. The use of leverage may exaggerate any increase or decrease in the net asset value, causing an Underlying Fund to be more volatile than if the Underlying Fund had not been leveraged. The use of leverage may increase expenses and increase the impact of an Underlying Fund's other risks. The use of leverage may cause an Underlying Fund to liquidate portfolio positions when it may not be advantageous to do so to satisfy its obligations or to meet regulatory requirements resulting in increased volatility of returns. There can be no guarantee that a leveraging strategy will be successful.

Liquidity: If a security is illiquid, an Underlying Fund might be unable to sell the security at a time when an Underlying Fund's manager might wish to sell, or at all. Further, the lack of an established secondary market may make it more difficult to value illiquid securities, exposing an Underlying Fund to the risk that the price at which it sells illiquid securities will be less than the price at which they were valued when held by an Underlying Fund, which could cause an Underlying Fund to lose money. The prices of illiquid securities may be more volatile than more liquid securities, and the risks associated with illiquid securities may be greater in times of financial stress. Certain securities that are liquid when purchased may later become illiquid, particularly in times of overall economic distress or due to geopolitical events such as sanctions, trading halts, or wars. In addition, markets or securities may become illiquid quickly.

Market: The market value of securities will fluctuate, sometimes sharply and unpredictably, based on overall economic conditions, governmental actions or intervention, market disruptions caused by trade disputes or other factors, political developments, and other factors.

Prices of equity securities tend to rise and fall more dramatically than those of debt instruments. Additionally, legislative, regulatory or tax policies or developments may adversely impact the investment techniques available to a manager, add to costs and impair the ability of an Underlying Fund to achieve its investment objectives.

Market Capitalization: Stocks fall into three broad market capitalization categories: large, mid, and small. Investing primarily in one category carries the risk that, due to current market conditions, that category may be out of favor with investors. If valuations of large-capitalization companies appear to be greatly out of proportion to the valuations of mid- or small-capitalization companies, investors may migrate to the stocks of mid- and small-capitalization companies causing a fund that invests in these companies to increase in value more rapidly than a fund that invests in large-capitalization companies. Investing in mid- and small-capitalization companies may be subject to special risks associated with narrower product lines, more limited financial resources, smaller management groups, more limited publicly available information, and a more limited trading market for their stocks as compared with large-capitalization companies. As a result, stocks of mid- and small-capitalization companies may be more volatile and may decline significantly in market downturns.

Market Disruption and Geopolitical: An Underlying Fund is subject to the risk that geopolitical events will disrupt securities markets and adversely affect global economies and markets. Due to the increasing interdependence among global economies and markets, conditions in one country, market, or region might adversely impact markets, issuers and/or foreign exchange rates in other countries, including the United States. Wars, terrorism, global health crises and pandemics, trade disputes, tariffs and other restrictions on trade or economic sanctions, rapid technological developments (such as artificial intelligence technologies), and other geopolitical events that have led, and may continue to lead, to increased market volatility and may have adverse short- or long-term effects on U.S. and global economies and markets, generally. For example, the COVID-19 pandemic resulted in significant market volatility, exchange suspensions and closures, declines in global financial markets, higher default rates, supply chain disruptions, and a substantial economic downturn in economies throughout the world. The economic impacts of COVID-19 have created a unique challenge for real estate markets. Many businesses have either partially or fully transitioned to a remote-working environment and this transition may negatively impact the occupancy rates of commercial real estate over time. Natural and environmental disasters and systemic market dislocations are also highly disruptive to economies and markets. In addition, military action by Russia in Ukraine has, and may continue to, adversely affect global energy and financial markets and therefore could affect the value of an Underlying Fund's investments, including beyond an Underlying Fund's direct exposure to Russian issuers or nearby geographic regions. Furthermore, the prolonged conflict between Hamas and Israel, and the potential expansion of the conflict in the surrounding areas and the involvement of other nations in such conflict, such as the Houthi movement's attacks on marine vessels in the Red Sea, could further destabilize the Middle East region and introduce new uncertainties in global markets, including the oil and natural gas markets. The extent and duration of the military action, sanctions, and resulting market disruptions are impossible to predict and could be substantial. A number of U.S. domestic banks and foreign (non-U.S.) banks have experienced financial difficulties and in some cases failures. There can be no certainty that the actions taken by regulators to limit the effect of those financial difficulties and failures on other banks or other financial institutions or on the U.S. or foreign (non-U.S.) economies generally will be successful. It is possible that more banks or other financial institutions will experience financial difficulties or fail, which may affect adversely other U.S. or foreign (non-U.S.) financial institutions and economies. These events as well as other changes in foreign (non-U.S.) and domestic economic, social, and political conditions also could adversely affect individual issuers or related groups of issuers, securities markets, interest rates, credit ratings, inflation, investor sentiment, and other factors affecting the value of an Underlying Fund's investments. Any of these occurrences could disrupt the operations of an Underlying Fund and of an Underlying Fund's service providers. Recent technological developments in, and the increasingly widespread use of, artificial intelligence, including machine learning technology and generative artificial intelligence ("AI"), may pose risks to an Underlying Fund. For instance, the economy may be significantly impacted by the advanced development and increased regulation of AI. As AI is used more widely, the profitability and growth of Underlying Fund holdings may be impacted, which could significantly impact the overall performance of the Underlying Fund. The legal and regulatory frameworks within which AI operates continue to rapidly evolve, and it is not possible to predict the full extent of current or future risks related thereto.

Market Volatility, Liquidity and Valuation: The risk that volatile or dramatic reductions in trading activity make it difficult for a fund to properly value its investments and that a fund may not be able to purchase or sell an investment at an attractive price, if at all.

Mid-Capitalization Company: Investments in mid-capitalization companies may involve greater risk than is customarily associated with larger, more established companies due to the greater business risks of a limited operating history, smaller size, limited markets, and financial resources, narrow product lines, less management depth, and more reliance on key personnel. Consequently, the securities of mid-capitalization companies may have limited market stability and may be subject to more abrupt or erratic market movements than securities of larger, more established growth companies or the market averages in general.

Mortgage- and/or Asset-Backed Securities: Defaults on, or low credit quality or liquidity of, the underlying assets of the asset-backed (including mortgage-backed) securities may impair the value of these securities and result in losses. There may be limitations on the enforceability of any security interest or collateral granted with respect to those underlying assets, and the value of collateral may not satisfy the obligation upon default. These securities also present a higher degree of prepayment and extension risk and interest rate risk than do other types of debt instruments.

Municipal Obligations: The municipal securities market is volatile and can be affected significantly by adverse tax, legislative, or political changes and the financial condition of the issuers of municipal securities. Among other risks, investments in municipal securities are subject to the risk that an issuer may delay payment, restructure its debt, or refuse to pay interest or repay principal on its debt.

Non-Diversification (Index): Depending on the composition of the Index, an Underlying Fund may at any time, with respect to 75% of an Underlying Fund's total assets, invest more than 5% of the value of its total assets in the securities of any one issuer. As a result, an Underlying Fund would at that time be non-diversified, as defined in the 1940 Act. A non-diversified investment company may invest a greater percentage of its assets in the securities of a single issuer than may a diversified investment company. A non-diversified investment company is subject to the risks of focusing investments in a small number of issuers, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be. An Underlying Fund may significantly underperform other mutual funds or investments due to the poor performance of relatively few securities, or even a single security, and an Underlying Fund's units may experience significant fluctuations in value.

Option Writing: When an Underlying Fund writes a covered call option on a security, it assumes the risk that it must sell the underlying security at an exercise price that may be lower than the market price of the security, and it gives up the opportunity to profit from a price increase in the underlying security above the exercise price. In addition, an Underlying Fund continues to bear the risk of a decline in the value of the underlying security.

When an Underlying Fund writes an index call option, it assumes the risk that it must pay the purchaser of the option a cash payment equal to any appreciation in the value of the index over the strike price of the call option during the option's term. While the amount of an Underlying Fund's potential loss is offset by the premium received when the option was written, the amount of the loss is theoretically unlimited.

Other Investment Companies: The main risk of investing in other investment companies, including ETFs, is the risk that the value of an investment company's underlying investments might decrease. Units of investment companies that are listed on an exchange may trade at a discount or premium from their net asset value. You will pay a proportionate share of the expenses of those other investment companies (including management fees, administration fees, and custodial fees) in addition to an Underlying Fund's expenses. The investment policies of the other investment companies may not be the same as those of an Underlying Fund; as a result, an investment in the other investment companies may be subject to additional or different risks than those to which an Underlying Fund is typically subject. In addition, shares of ETFs may trade at a premium or discount to net asset value and are subject to secondary market trading risks. Secondary markets may be subject to irregular trading activity, wide bid/ask spreads, and extended trade settlement periods in times of market stress because market makers and authorized participants may step away from making a market in an ETF's shares, which could cause a material decline in the ETF's net asset value.

Portfolio Turnover: A high portfolio turnover rate may increase transaction costs, which may lower an Underlying Fund's performance and may increase the likelihood of capital gains distributions.

Precious Metal and Related Securities: Prices of precious metals and of precious metal related securities historically have been very volatile. The high volatility of precious metal prices may adversely affect the financial condition of companies involved with precious metals. The production and sale of precious metals by governments or central banks or other larger holders can be affected by various economic, financial, social and political factors, which may be unpredictable and may have a significant impact on the prices of precious metals. Other factors that may affect the prices of precious metals and securities related to them include changes in inflation, the outlook for inflation, and changes in industrial and commercial demand for precious metals.

Preferred Stocks: Preferred stock generally has preference over common stock but is generally subordinate to debt instruments with respect to dividends and liquidation. Preferred stocks are subject to the risks associated with other types of equity securities, as well as greater credit or other risks than senior debt instruments. In addition, preferred stocks are subject to other risks, such as risks related to deferred and omitted distributions, limited voting rights, liquidity, interest rate, regulatory changes and special redemption rights.

Prepayment and Extension: Many types of fixed-income instruments are subject to prepayment and extension risk. Prepayment risk is the risk that the issuer of a debt instrument will pay back the principal earlier than expected. This risk is heightened in a falling market interest rate environment. Prepayment may expose an Underlying Fund to a lower rate of return upon reinvestment of principal. Also, if a debt instrument subject to prepayment has been purchased at a premium, the value of the premium would be lost in the event of prepayment. Extension risk is the risk that the issuer of a debt instrument will pay back the principal later than expected. This risk is heightened in a rising market interest rate environment. This may negatively affect performance, as the value of the debt instrument decreases when principal payments are made later than expected. Additionally, an Underlying Fund may be prevented from investing proceeds it would have received at a given time at the higher prevailing interest rates.

Price Volatility: The value of an Underlying Fund's units may fluctuate significantly in the short term.

Real Estate Companies and Real Estate Investment Trusts: Investing in real estate companies and REITs may subject an Underlying Fund to risks similar to those associated with the direct ownership of real estate, including losses from casualty or condemnation, changes in local and general economic conditions, supply and demand, market interest rates, zoning laws, regulatory limitations on rents, property taxes, overbuilding, high foreclosure rates, and operating expenses in addition to terrorist attacks, wars, or other acts that destroy real property. In addition, REITs may also be affected by tax and regulatory requirements in that a REIT may not qualify for favorable tax treatment or regulatory exemptions. In addition, REITs may also be affected by tax and regulatory requirements in that a REIT may not qualify for favorable tax treatment or regulatory exemptions. Investments in REITs are affected by the management skill of the REITs sponsor. An Underlying Fund will indirectly bear its proportionate share of expenses, including management fees, paid by each REIT in which it invests.

Redemption: An Underlying Fund may need to sell securities at times it would not otherwise do so in order to meet redemption requests. Selling securities to meet such redemptions may cause an Underlying Fund to experience a loss, increase the Underlying Fund's transactions costs and/or have tax consequences. To the extent that a large shareholder (include a fund of funds or 529 college savings plan) invests in an Underlying Fund, the Underlying Fund may experience relatively large redemptions as such shareholder reallocates its assets.

Repurchase Agreements: In the event that the other party to a repurchase agreement defaults on its obligations, an Underlying Fund would generally seek to sell the underlying security serving as collateral for the repurchase agreement. However, the value of collateral may be insufficient to satisfy the counterparty's obligation and/or an Underlying Fund may encounter delay and incur costs before being able to sell the security. Such a delay may involve loss of interest or a decline in price of the security, which could result in a loss. In addition, if an Underlying Fund is characterized by a court as an unsecured creditor, it would be at risk of losing some or all of the principal and interest involved in the transaction.

Restricted Securities: Securities that are legally restricted as to resale *such as those issued in private placements), including securities governed by Rule 144A and Regulation S, and securities that are offered in reliance on Section 4(a)(2) of the Securities Act of 1933, as amended, are referred to as "restricted securities." Restricted securities may be sold in private placement transactions between issuers and their purchasers and may be neither listed on an exchange nor traded in other established markets. Due to the absence of a public trading market, restricted securities may be more volatile, less liquid, and more difficult to value than publicly-traded securities. The price realized from the sale of these securities could be less than the amount originally paid or less than their fair value if they are resold in privately negotiated transactions. In addition, these securities may not be subject to disclosure and other investment protection requirements that are afforded to publicly-traded securities. Certain restricted securities represent investments in smaller, less seasoned issuers, which may involve greater risk.

Risks of Loan Assignments and Participations: As the purchaser of an assignment, the Underlying Fund typically succeeds to all the rights and obligations of the assigning institution and becomes a lender under the credit agreement with respect to the debt obligation; however, the Underlying Fund may not be able unilaterally to enforce all rights and remedies under the loan and with regard to any associated collateral. Because assignments may be arranged through private negotiations between potential assignees and potential assignors, the rights and obligations acquired by the Underlying Fund as the purchaser of an assignment may differ from, and be more limited than, those held by the assigning lender. In addition, if the loan is foreclosed, the Underlying Fund could become part owner of any collateral and could bear the costs

and liabilities of owning and disposing of the collateral. The Underlying Fund may be required to pass along to a purchaser that buys a loan from the Underlying Fund by way of assignment a portion of any fees to which the Underlying Fund is entitled under the loan. In connection with purchasing participations, the Underlying Fund generally will have no right to enforce compliance by the borrower with the terms of the loan agreement relating to the loan, nor any rights of set-off against the borrower, and the Underlying Fund may not directly benefit from any collateral supporting the loan in which it has purchased the participation. As a result, the Underlying Fund will be subject to the credit risk of both the borrower and the lender that is selling the participation. In the event of the insolvency of the lender selling a participation, the Underlying Fund may be treated as a general creditor of the lender and may not benefit from any set-off between the lender and the borrower.

Securities Lending: Securities lending involves two primary risks: “investment risk” and “borrower default risk.” When lending securities, an Underlying Fund will receive cash or U.S. government securities as collateral. Investment risk is the risk that an Underlying Fund will lose money from the investment of the cash collateral received from the borrower. Borrower default risk is the risk that an Underlying Fund will lose money due to the failure of a borrower to return a borrowed security. Securities lending may result in leverage. The use of leverage may exaggerate any increase or decrease in the net asset value, causing an Underlying Fund to be more volatile. The use of leverage may increase expenses and increase the impact of an Underlying Fund’s other risks.

Small-Capitalization Company: Investments in small-capitalization companies may involve greater risk than is customarily associated with larger, more established companies due to the greater business risks of a limited operating history, small size, limited markets and financial resources, narrow product lines, less management depth, and more reliance on key personnel. The securities of small-capitalization companies are subject to liquidity risk as they are often traded over-the-counter and may not be traded in volumes typically seen on national securities exchanges.

Sovereign Debt: Sovereign debt is issued or guaranteed by foreign (non-U.S.) government entities. Investments in sovereign debt are subject to the risk that a government entity may delay payment, restructure its debt, or refuse to pay interest or repay principal on its sovereign debt due to cash flow problems, insufficient foreign currency reserves, political considerations, social changes, the relative size of its debt position to its economy, or its failure to put in place economic reforms required by the International Monetary Fund or other multilateral agencies. If a government entity defaults, it may ask for more time in which to pay or for further loans. There is no legal process for collecting amounts owed on sovereign debts, such as bankruptcy proceedings, that a government does not pay.

Structured Notes: Structured notes are investments, the interest rate or principal of which is linked to currencies, interest rates, commodities, indices, or other financial indicators (each, a “reference instrument”). Structured notes may entail a greater degree of market risk than other types of debt instruments because the investor also bears the risk of the reference instrument. Structured notes may be more volatile, less liquid, and more difficult to accurately price than less complex securities and other types of debt instruments. In addition, structured notes are subject to other risks, including interest rate risk, credit risk, and liquidity risk.

Subsidiary Risk: By investing in the Subsidiary, an Underlying Fund is indirectly exposed to the risks associated with the Subsidiary’s investments. The commodity-related instruments held by the Subsidiary are generally similar to those that are permitted to be held by an Underlying Fund and are subject to the same risks that apply to similar investments if held directly by an Underlying Fund. There can be no assurance that the investment objective of the Subsidiary will be achieved. The Subsidiary is not registered under the Investment Company Act of 1940, as amended (the “Investment Company Act”), and, unless otherwise noted, is not subject to all the investor protections of the Investment Company Act. However, an Underlying Fund wholly owns and controls the Subsidiary, and an Underlying Fund and the Subsidiary are both managed by BlackRock, making it unlikely that the Subsidiary will take action contrary to the interests of an Underlying Fund and its shareholders. The Board has oversight responsibility for the investment activities of the Underlying Fund, including its investment in the Subsidiary, and the Underlying Fund’s role as sole shareholder of the Subsidiary. The Subsidiary is subject to the same investment restrictions and limitations, and follows the same compliance policies and procedures, as an Underlying Fund, except that the Subsidiary may invest without limitation in commodity-related instruments. Changes in the laws of the United States and/or the Cayman Islands could result in the inability of an Underlying Fund and/or the Subsidiary to operate as described and could adversely affect an Underlying Fund.

U.S. Government Securities and Obligations: U.S. government securities are obligations of, or guaranteed by, the U.S. government, its agencies, or government-sponsored enterprises. U.S. government securities are subject to market risk and interest rate risk, and may be subject to varying degrees of credit risk.

Value Investing: Securities that appear to be undervalued may never appreciate to the extent expected. Further, because the prices of value-oriented securities tend to correlate more closely with economic cycles than growth-oriented securities, they generally are more sensitive to changing economic conditions, such as changes in market interest rates, corporate earnings, and industrial production. The manager may be wrong in its assessment of a company’s value and the securities an Underlying Fund holds may not reach their full values. Risks associated with value investing include that a security that is perceived by the manager to be undervalued may actually be appropriately priced and, thus, may not appreciate and provide anticipated capital growth. The market may not favor value-oriented securities and may not favor equities at all. During those periods, an Underlying Fund’s relative performance may suffer. There is a risk that funds that invest in value-oriented securities may underperform other funds that invest more broadly.

Warrants: If the price of the underlying stock does not rise above the exercise price before the warrant expires, the warrant generally expires without any value and the Underlying Fund will lose any amount it paid for the warrant. Thus, investments in warrants may involve substantially more risk than investments in common stock. Warrants may trade in the same markets as their underlying stock; however, the price of the warrant does not necessarily move with the price of the underlying stock.

When Issued, Delayed Delivery, and Forward Commitment Transactions: When-issued, delayed delivery and forward commitment transactions involve the risk that the security an Underlying Fund buys will lose value prior to its delivery. These transactions may result in leverage. The use of leverage may exaggerate any increase or decrease in the net asset value, causing an Underlying Fund to be more volatile. The use of leverage may increase expenses and increase the impact of an Underlying Fund’s other risks. There also is the risk that the security will not be issued or that the other party will not meet its obligation. If this occurs, an Underlying Fund loses both the investment opportunity for the assets it set aside to pay for the security and any gain in the security’s price.

Zero-Coupon Bonds and Payment-in-Kind Securities: Zero-coupon bonds and payment-in-kind securities may be subject to greater fluctuations in price due to market interest rate changes than conventional interest-bearing securities. An Underlying Fund may have to pay out the imputed income on zero-coupon bonds without receiving the actual cash currency, resulting in a loss.

APPENDIX D: INVESTMENT RESULTS – AS OF DECEMBER 31, 2025

The table below shows the average annual total returns after deducting ongoing fees for each Option as of December 31, 2025. The performance data reflects past performance with and without any applicable sales or redemption charges, but does not reflect the \$25 annual maintenance fee, which is waived in certain circumstances. If these amounts were reflected, returns would be less than those shown. For comparison purposes, the table also shows the returns for a benchmark index that, as of the date of this Program Description, applies to each Option. The indices are not available for investment and the returns for the indices do not reflect sales charges, fees, brokerage commissions, taxes, or other expenses of investing. To obtain up-to-date performance information for any Option, please visit the Advisor Program's website at www.tomorrowsscholar.com or contact your financial advisor. **Past performance is not a guarantee of future results.**

Average Annual Total Returns (%) as of December 31, 2025 ^{1,2}												
Option/Index	Class	Without Sales Charges					With Sales Charges					
		1 Yr	3 Yrs	5 Yrs	10 Yrs	Since Inception	1 Yr ^{3,4}	3 Yrs	5 Yrs	10 Yrs	Since Inception	Inception Date
Voya 529 Age 0-4 Option	A	18.11	17.59	8.59	9.80	N/A	13.99	16.21	7.54	9.27	N/A	10/26/2012
	C	17.22	16.68	7.76	9.39	N/A	16.22	16.68	7.76	9.39	N/A	10/26/2012
	W	18.38	17.85	8.84	10.05	N/A	18.38	17.85	8.84	10.05	N/A	10/26/2012
Voya 529 Age 0-4 Composite Index		19.33	18.38	10.03	11.11	N/A	19.33	18.38	10.03	11.11	N/A	
Voya 529 Age 5-8 Option	A	15.63	15.16	6.70	8.70	N/A	14.63	15.16	6.70	8.70	N/A	10/26/2012
	C	16.80	16.30	7.76	9.37	N/A	16.80	16.30	7.76	9.37	N/A	10/26/2012
	W	16.52	16.02	7.50	9.11	N/A	12.43	14.66	6.46	8.58	N/A	10/26/2012
Voya 529 Age 5-8 Composite Index		17.73	16.73	8.85	10.33	N/A	17.73	16.73	8.85	10.33	N/A	
Voya 529 Age 9-10 Option	A	13.82	13.33	5.57	7.55	N/A	12.82	13.33	5.57	7.55	N/A	10/26/2012
	C	14.98	14.47	6.63	8.22	N/A	14.98	14.47	6.63	8.22	N/A	10/26/2012
	W	14.69	14.18	6.37	4.97	N/A	10.69	12.83	5.33	7.45	N/A	10/26/2012
Voya 529 Age 9-10 Composite Index		15.73	14.64	7.31	8.87	N/A	15.73	14.64	7.31	8.87	N/A	
Voya 529 Age 11-12 Option	A	13.51	12.92	5.61	7.35	N/A	9.52	11.60	4.58	6.83	N/A	10/26/2012
	C	12.64	12.08	4.81	6.95	N/A	11.64	12.08	4.81	6.95	N/A	10/26/2012
	W	13.77	13.20	5.86	7.61	N/A	13.77	13.20	5.86	7.61	N/A	10/26/2012
Voya 529 Age 11-12 Composite Index		14.33	13.29	6.56	8.29	N/A	14.33	13.29	6.56	8.29	N/A	
Voya 529 Age 13-14 Option	A	11.82	11.42	4.87	6.57	N/A	7.90	10.10	3.85	6.06	N/A	10/26/2012
	C	10.95	10.60	4.09	6.18	N/A	9.95	10.60	4.09	6.18	N/A	10/26/2012
	W	12.08	11.71	5.12	6.83	N/A	12.08	11.71	5.12	6.83	N/A	10/26/2012
Voya 529 Age 13-14 Composite Index		12.50	11.64	5.59	7.34	N/A	12.50	11.64	5.59	7.34	N/A	
Voya 529 Age 15 Option	A	9.85	9.80	3.92	5.82	N/A	5.99	8.51	2.92	5.31	N/A	10/26/2012
	C	9.08	9.02	9.14	5.43	N/A	8.08	9.02	3.14	5.43	N/A	10/26/2012
	W	10.18	10.10	4.18	6.09	N/A	10.18	10.10	4.18	6.09	N/A	10/26/2012
Voya 529 Age 15 Composite Index		10.72	10.19	4.59	6.52	N/A	10.72	10.19	4.59	6.52	N/A	
Voya 529 Age 16 Option	A	9.68	9.50	3.72	5.31	N/A	5.84	8.20	2.72	4.79	N/A	10/26/2012
	C	8.90	8.70	2.96	4.92	N/A	7.90	8.70	2.96	4.92	N/A	10/26/2012
	W	10.01	9.77	3.98	5.58	N/A	10.01	9.77	3.98	5.58	N/A	10/26/2012
Voya 529 Age 16 Composite Index		10.50	9.82	4.27	5.91	N/A	10.50	9.82	4.27	5.91	N/A	
Voya 529 Age 17 Option	A	8.01	7.71	2.75	4.36	N/A	4.26	6.43	1.75	3.85	N/A	10/26/2012
	C	7.19	6.89	1.97	3.98	N/A	6.19	6.89	1.97	3.98	N/A	10/26/2012
	W	8.33	7.98	3.00	4.62	N/A	8.33	7.98	3.00	4.62	N/A	10/26/2012
Voya 529 Age 17 Composite Index		8.64	7.91	3.09	4.79	N/A	8.64	7.91	3.09	4.79	N/A	
Voya 529 Age 18+ Option	A	7.19	6.47	1.91	3.35	N/A	3.44	5.23	0.92	2.85	N/A	10/26/2012
	C	6.37	5.68	1.16	2.95	N/A	5.37	5.68	1.16	2.95	N/A	10/26/2012
	W	7.41	6.72	2.15	3.60	N/A	7.41	6.72	2.15	3.60	N/A	10/26/2012
Voya 529 Age 18+ Composite Index		7.59	6.53	2.15	3.61	N/A	7.59	6.53	2.15	3.61	N/A	
Voya 529 Aggressive Growth Option	A	18.37	18.45	9.71	10.37	N/A	14.21	17.05	8.65	9.84	N/A	10/26/2012
	C	17.47	17.58	8.89	9.97	N/A	16.47	17.58	8.89	9.97	N/A	10/26/2012
	W	18.65	18.74	9.98	10.65	N/A	18.65	18.74	9.98	10.65	N/A	10/26/2012
Voya 529 Aggressive Growth Composite Index		19.53	19.27	10.95	11.63	N/A	19.53	19.27	10.95	11.63	N/A	

Average Annual Total Returns (%) as of December 31, 2025 ^{1,2}

Average Annual Total Returns (%) as of December 31, 2025 ^{1,2}												
Without Sales Charges							With Sales Charges					
Option/Index	Class	1 Yr	3 Yrs	5 Yrs	10 Yrs	Since Inception	1 Yr ^{3,4}	3 Yrs	5 Yrs	10 Yrs	Since Inception	Inception Date
Voya 529 Growth Plus Option	A	17.21	16.76	8.38	9.40	N/A	13.10	15.38	7.29	8.87	N/A	10/26/2012
	C	16.32	15.88	7.53	8.99	N/A	15.32	15.88	7.53	8.99	N/A	10/26/2012
	W	17.47	17.06	8.61	9.67	N/A	17.47	17.06	8.61	9.67	N/A	10/26/2012
Voya 529 Growth Plus Composite Index		18.20	17.43	9.44	10.51	N/A	18.20	17.43	9.44	10.51	N/A	
Voya 529 Balanced Option	A	14.75	14.68	8.08	8.21	N/A	10.75	13.32	6.04	7.69	N/A	10/26/2012
	C	13.91	13.85	6.28	7.81	N/A	12.91	13.85	6.28	7.81	N/A	10/26/2012
	W	15.04	14.98	7.35	8.49	N/A	15.04	14.98	7.35	8.49	N/A	10/26/2012
Voya 529 Balanced Composite Index		15.66	15.22	7.99	9.15	N/A	15.66	15.22	7.99	9.15	N/A	
Voya 529 Conservative Plus Option	A	12.06	11.57	5.12	6.35	N/A	8.14	12.05	4.10	5.83	N/A	10/26/2012
	C	11.16	10.75	4.33	5.95	N/A	10.16	10.75	4.33	5.95	N/A	10/26/2012
	W	12.27	11.85	5.37	6.62	N/A	12.27	11.85	5.37	6.62	N/A	10/26/2012
Voya 529 Conservative Plus Composite Index		12.81	12.14	5.91	7.07	N/A	12.81	12.14	5.91	7.07	N/A	
Voya 529 Ultra Conservative Option	A	6.56	6.19	1.29	3.25	N/A	2.82	4.95	0.32	2.75	N/A	10/26/2012
	C	5.76	5.40	0.54	2.86	N/A	4.76	5.40	0.54	2.86	N/A	10/26/2012
	W	6.80	6.45	1.54	3.50	N/A	6.80	6.45	1.54	3.50	N/A	10/26/2012
Voya 529 Ultra Conservative Composite Index		7.08	6.23	1.50	3.50	N/A	7.08	6.23	1.50	3.50	N/A	
American Century Small Cap Value Option ⁵	A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	02/05/2025
	C	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	02/05/2025
	W	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	02/05/2025
Russell 2000 [®] Value Index		N/A	N/A	N/A	N/A	10.42	N/A	N/A	N/A	N/A	10.42	
BlackRock Global Allocation Option	A	19.16	13.33	5.34	7.08	N/A	14.97	11.99	4.32	6.56	N/A	10/26/2012
	C	18.27	12.47	4.55	6.67	N/A	17.27	12.47	4.55	6.67	N/A	10/26/2012
	W	19.48	13.59	5.60	7.35	N/A	19.48	13.59	5.60	7.35	N/A	10/26/2012
BlackRock Global Allocation Index		21.12	15.20	7.28	8.39	N/A	21.12	15.20	7.28	8.39	N/A	
Fidelity Global ex-US Index Option ⁵	A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	04/28/2025
	C	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	04/28/2025
	W	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	04/28/2025
MSCI ACWI ex USA Index		N/A	N/A	N/A	N/A	22.47	N/A	N/A	N/A	N/A	22.47	
Fidelity U.S. Bond Index Option ⁵	A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	04/28/2025
	C	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	04/28/2025
	W	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	04/28/2025
Bloomberg U.S. Aggregate Bond Index		N/A	N/A	N/A	N/A	4.20	N/A	N/A	N/A	N/A	4.20	
Nuveen Balanced Option	A	13.27	15.50	7.91	9.58	N/A	9.32	14.13	6.87	9.05	N/A	10/26/2012
	C1	13.02	15.22	7.64	9.30	N/A	12.52	15.22	7.64	9.30	N/A	10/26/2012
	W	13.57	15.80	8.18	9.85	N/A	13.57	15.80	8.18	9.85	N/A	10/26/2012
65% S&P 500 [®] Index/35% Bloomberg U.S. Aggregate Bond Index		14.23	16.39	9.21	10.42	N/A	14.23	16.39	9.21	10.42	N/A	
Nuveen Equity Index Option	A	16.63	21.71	12.68	13.79	N/A	12.55	20.28	11.59	13.24	N/A	10/26/2012
	C1	16.32	21.40	12.40	13.51	N/A	15.82	21.40	12.40	13.51	N/A	10/26/2012
	W	16.92	22.01	12.97	14.07	N/A	16.92	22.01	12.97	14.07	N/A	10/26/2012
Russell 3000 [®] Index		17.15	22.25	16.15	14.29	N/A	17.15	22.25	16.15	14.29	N/A	
TIAA-CREF Principal Protection Option	N/A	2.79	2.75	2.03	1.69	N/A	2.79	2.75	2.03	1.69	N/A	10/26/2012
Bloomberg Short Treasury 1-3 Month Index		4.29	4.91	3.24	9.62	N/A	4.29	4.91	3.24	9.62	N/A	
Nuveen Small-Cap Blend Index Option	A	12.37	13.35	5.76	9.29	N/A	8.43	12.00	4.74	8.77	N/A	10/26/2012
	C1	12.09	13.06	5.51	9.03	N/A	11.59	13.06	5.51	9.03	N/A	10/26/2012
	W	12.69	13.64	3.06	9.57	N/A	12.69	13.64	6.03	9.57	N/A	10/26/2012

Average Annual Total Returns (%) as of December 31, 2025 ^{1,2}												
Without Sales Charges							With Sales Charges					
Option/Index	Class	1 Yr	3 Yrs	5 Yrs	10 Yrs	Since Inception	1 Yr ^{3,4}	3 Yrs	5 Yrs	10 Yrs	Since Inception	Inception Date
Russell 2000 [®] Index		12.81	13.73	6.09	9.62	N/A	12.81	13.73	6.09	9.62	N/A	
Voya Corporate Leaders [®] 100 Option	A	17.34	17.95	13.13	12.51	N/A	13.24	16.56	12.03	11.96	N/A	10/26/2012
	C	16.48	17.07	12.31	12.09	N/A	15.48	17.07	12.31	12.09	N/A	10/26/2012
	W	17.66	18.25	13.43	12.78	N/A	17.66	18.25	13.43	12.78	N/A	10/26/2012
S&P 500 [®] Index		17.88	23.01	14.42	14.82	N/A	17.88	23.01	14.42	14.82	N/A	
Voya GNMA Income Option	A	7.30	4.46	0.13	1.29	N/A	3.57	3.22	-0.84	0.80	N/A	10/26/2012
	C	6.42	3.66	-0.64	0.91	N/A	5.42	3.66	-0.64	0.91	N/A	10/26/2012
	W	7.62	4.73	0.40	1.53	N/A	7.62	4.73	0.40	1.53	N/A	10/26/2012
Bloomberg GNMA Index		8.08	4.77	0.23	1.50	N/A	8.08	4.77	0.23	1.50	N/A	
Voya High Yield Bond Option	A	7.99	8.83	3.26	5.02	N/A	4.24	7.54	2.26	4.51	N/A	10/26/2012
	C	7.18	8.01	2.50	4.62	N/A	6.18	8.01	2.50	4.62	N/A	10/26/2012
	W	8.27	9.11	3.53	5.29	N/A	8.27	9.11	3.53	5.29	N/A	10/26/2012
Bloomberg High Yield Bond – 2% Issuer Constrained Composite Index		8.62	10.06	4.50	6.52	N/A	8.62	10.06	4.50	6.52	N/A	
Voya Intermediate Bond Option	A	7.11	5.39	-0.29	2.25	N/A	3.39	4.13	-1.24	1.75	N/A	12/12/2014
	C	6.38	4.59	-1.03	1.87	N/A	5.38	4.59	-1.03	1.87	N/A	12/12/2014
	W	7.44	5.67	-0.02	2.51	N/A	7.44	5.67	-0.02	2.51	N/A	12/12/2014
Bloomberg U.S. Aggregate Bond Index		7.30	4.66	-0.36	2.01	N/A	7.30	4.66	-0.36	2.01	N/A	
Voya Large Cap Growth Option	A	14.89	28.61	11.93	14.83	N/A	10.86	27.09	10.84	14.27	N/A	10/26/2012
	C	14.03	27.64	11.13	14.41	N/A	13.03	27.64	11.10	14.41	N/A	10/26/2012
	W	15.17	28.92	12.21	15.12	N/A	15.17	28.92	12.21	15.12	N/A	10/26/2012
Russell 1000 [®] Growth Index		18.56	31.15	15.32	18.13	N/A	18.56	31.15	15.32	18.13	N/A	
Voya Large Cap Value Option	A	12.61	14.08	12.51	10.78	N/A	8.68	12.73	11.42	10.24	N/A	10/26/2012
	C	11.76	13.21	11.66	10.36	N/A	10.76	13.21	11.66	10.36	N/A	10/26/2012
	W	12.85	14.36	12.78	11.06	N/A	12.85	14.36	12.78	11.06	N/A	10/26/2012
Russell 1000 [®] Value Index		15.91	13.90	11.33	10.53	N/A	15.91	13.90	11.33	10.53	N/A	
Voya Mid Cap Opportunities Option	A	3.30	13.52	3.93	10.27	N/A	-0.31	12.18	2.93	9.73	N/A	10/26/2012
	C	2.54	12.66	3.17	9.86	N/A	1.54	12.66	3.17	9.86	N/A	10/26/2012
	W	3.54	13.79	4.19	10.55	N/A	3.54	13.79	4.19	10.55	N/A	10/26/2012
Russell Midcap [®] Growth Index		8.66	18.64	6.65	12.49	N/A	8.66	18.64	6.65	12.49	N/A	
Voya Multi-Manager International Equity Option	A	27.18	14.74	4.61	6.25	N/A	22.76	13.40	3.60	5.73	N/A	01/24/2014
	C	26.21	13.86	3.81	5.86	N/A	25.21	13.86	3.81	5.86	N/A	01/24/2014
	W	27.55	15.01	4.87	6.51	N/A	27.55	15.01	4.87	6.51	N/A	01/24/2014
MSCI EAFE [®] Index		31.22	17.22	8.92	8.18	N/A	31.22	17.22	8.92	8.18	N/A	
Voya Multi-Manager Mid Cap Value Option	A	3.73	7.65	7.25	N/A	8.25	0.09	6.38	6.22	N/A	7.72	01/29/2016
	C	2.91	6.84	6.49	N/A	7.85	1.97	6.84	6.49	N/A	7.85	01/29/2016
	W	4.01	7.94	7.56	N/A	8.54	4.01	7.94	7.56	N/A	8.54	01/29/2016
Russell Midcap Value Index		11.05	12.27	9.83	N/A	169.08	11.05	12.27	9.83	N/A	169.08	
Voya Small Cap Growth Option	A	14.00	17.37	N/A	N/A	12.27	9.99	15.99	N/A	N/A	11.20	04/27/2022
	C	13.23	16.45	N/A	N/A	11.43	12.23	16.45	N/A	N/A	11.43	04/27/2022
	W	14.36	17.64	N/A	N/A	12.55	14.36	17.64	N/A	N/A	12.55	04/27/2022
Russell 2000 [®] Growth Index		13.01	15.59	N/A	N/A	46.62	13.01	15.59	N/A	N/A	46.62	

1. Updated performance information is available online at www.tomorrowsscholar.com
2. The performance data shown represents past performance. Past performance is not a guarantee of future results. Investment returns and principal value will fluctuate, so that investor's units, when sold, may be worth more or less than their original cost. Current performance may be lower or higher than performance data cited.
3. Performance results for Class A units reflect a maximum initial sales charge of 3.50% imposed at the time of purchase.
4. Performance results for Class C units reflect a CDSC of 1.00% imposed at the end of year one.
5. Because the Option did not have a full calendar year of operations as of December 31, 2025, there is no annual performance information included.

APPENDIX E: TOTAL ESTIMATED ANNUAL FEES AND EXPENSES – EFFECTIVE MAY 7, 2026

Each Option pays a pro rata share of the expenses of the underlying funds in which it invests. Estimated underlying fund expenses are based on a weighted average of each underlying fund’s net expense ratio, as reported in the underlying fund’s prospectus in effect at the time this Program Description was prepared. The amount of the underlying fund expense charged to an Option is based on the amount of each fund held and the expense ratio of that fund.

In addition to a \$25 Annual Account Maintenance Fee¹ discussed in “Service and transaction fees”, the following tables describe the fees and expenses that you may pay when you purchase units in an Option.

No Class

	Annual Asset Based Fees – As of May 7, 2026					Additional Investor Expenses		
	Estimated Underlying Investment Expenses	Board Fee ²	Program Manager Fee	Distribution and Service Fee ³	Total Annual Asset-Based Fees	Maximum Initial Sales Charge	Maximum Initial Sales Charge	Annual Account Maintenance Fee
TIAA-CREF Principal Protection Option	0.00%	0.05%	0.08%	0.05%	0.18%	None	None	\$25

Class A

	Annual Asset Based Fees – As of May 7, 2026					Additional Investor Expenses		
	Estimated Underlying Investment Expenses	Board Fee ²	Program Manager Fee	Distribution and Service Fee ³	Total Annual Asset-Based Fees	Maximum Initial Sales Charge ⁴	Maximum Deferred Sales Charge ⁵	Annual Account Maintenance Fee
Voya 529 Aggressive Growth Option	0.43%	0.05%	0.08%	0.25%	0.81%	3.50%	None	\$25
Voya 529 Growth Plus Option	0.44%	0.05%	0.08%	0.25%	0.82%	3.50%	None	\$25
Voya 529 Balanced Option	0.43%	0.05%	0.08%	0.25%	0.81%	3.50%	None	\$25
Voya 529 Conservative Plus Option	0.42%	0.05%	0.08%	0.25%	0.80%	3.50%	None	\$25
Voya 529 Ultra Conservative Option	0.41%	0.05%	0.08%	0.25%	0.79%	3.50%	None	\$25
Voya 529 Age 0-4 Option	0.45%	0.05%	0.08%	0.25%	0.83%	3.50%	None	\$25
Voya 529 Age 5-8 Option	0.44%	0.05%	0.08%	0.25%	0.82%	3.50%	None	\$25
Voya 529 Age 9-10 Option	0.44%	0.05%	0.08%	0.25%	0.82%	3.50%	None	\$25
Voya 529 Age 11-12 Option	0.44%	0.05%	0.08%	0.25%	0.82%	3.50%	None	\$25
Voya 529 Age 13-14 Option	0.42%	0.05%	0.08%	0.25%	0.80%	3.50%	None	\$25
Voya 529 Age 15 Option	0.41%	0.05%	0.08%	0.25%	0.79%	3.50%	None	\$25
Voya 529 Age 16 Option	0.41%	0.05%	0.08%	0.25%	0.79%	3.50%	None	\$25
Voya 529 Age 17 Option	0.41%	0.05%	0.08%	0.25%	0.79%	3.50%	None	\$25
Voya 529 Age 18+ Option	0.37%	0.05%	0.08%	0.25%	0.75%	3.50%	None	\$25
American Century Small Cap Value Option	0.88%	0.05%	0.08%	0.25%	1.26%	3.50%	None	\$25
BlackRock Global Allocation Option	0.87%	0.05%	0.08%	0.25%	1.25%	3.50%	None	\$25
Fidelity Global ex-US Index Option	0.06%	0.05%	0.08%	0.25%	0.44%	3.50%	None	\$25
Fidelity U.S. Bond Index Option	0.03%	0.05%	0.08%	0.25%	0.41%	3.50%	None	\$25
Nuveen Balanced Option	0.06%	0.05%	0.08%	0.25%	0.44%	3.50%	None	\$25
Nuveen Equity Index Option	0.05%	0.05%	0.08%	0.25%	0.43%	3.50%	None	\$25
Nuveen Small-Cap Blend Index Option	0.06%	0.05%	0.08%	0.25%	0.44%	3.50%	None	\$25
Voya Corporate Leaders® 100 Option	0.49%	0.05%	0.08%	0.25%	0.87%	3.50%	None	\$25
Voya GNMA Income Option	0.54%	0.05%	0.08%	0.25%	0.92%	3.50%	None	\$25
Voya High Yield Bond Option	0.68%	0.05%	0.08%	0.25%	1.06%	3.50%	None	\$25
Voya Intermediate Bond Option	0.36%	0.05%	0.08%	0.25%	0.74%	3.50%	None	\$25
Voya Large Cap Growth Option	0.58%	0.05%	0.08%	0.25%	0.96%	3.50%	None	\$25
Voya Large Cap Value Option	0.61%	0.05%	0.08%	0.25%	0.99%	3.50%	None	\$25
Voya Mid Cap Opportunities Option	0.93%	0.05%	0.08%	0.25%	1.31%	3.50%	None	\$25
Voya Multi-Manager International Equity Option	0.88%	0.05%	0.08%	0.25%	1.26%	3.50%	None	\$25
Voya Multi-Manager Mid Cap Value Option	0.78%	0.05%	0.08%	0.25%	1.16%	3.50%	None	\$25
Voya Small Cap Growth Option	0.95%	0.05%	0.08%	0.25%	1.33%	3.50%	None	\$25

Class C

	Annual Asset Based Fees – As of May 7, 2026					Additional Investor Expenses		
	Estimated Underlying Investment Expenses	Board Fee ²	Program Manager Fee	Distribution and Service Fee ^{3,7}	Total Annual Asset-Based Fees	Maximum Initial Sales Charge	Maximum Deferred Sales Charge	Annual Account Maintenance Fee
Voya 529 Aggressive Growth Option	0.43%	0.05%	0.08%	1.00%	1.56%	None	1.00%	\$25
Voya 529 Growth Plus Option	0.44%	0.05%	0.08%	1.00%	1.57%	None	1.00%	\$25
Voya 529 Balanced Option	0.43%	0.05%	0.08%	1.00%	1.56%	None	1.00%	\$25
Voya 529 Conservative Plus Option	0.42%	0.05%	0.08%	1.00%	1.55%	None	1.00%	\$25
Voya 529 Ultra Conservative Option	0.41%	0.05%	0.08%	1.00%	1.54%	None	1.00%	\$25
Voya 529 Age 0-4 Option	0.45%	0.05%	0.08%	1.00%	1.58%	None	1.00%	\$25
Voya 529 Age 5-8 Option	0.44%	0.05%	0.08%	1.00%	1.57%	None	1.00%	\$25
Voya 529 Age 9-10 Option	0.44%	0.05%	0.08%	1.00%	1.57%	None	1.00%	\$25
Voya 529 Age 11-12 Option	0.44%	0.05%	0.08%	1.00%	1.57%	None	1.00%	\$25
Voya 529 Age 13-14 Option	0.42%	0.05%	0.08%	1.00%	1.55%	None	1.00%	\$25
Voya 529 Age 15 Option	0.41%	0.05%	0.08%	1.00%	1.54%	None	1.00%	\$25
Voya 529 Age 16 Option	0.41%	0.05%	0.08%	1.00%	1.54%	None	1.00%	\$25
Voya 529 Age 17 Option	0.41%	0.05%	0.08%	1.00%	1.54%	None	1.00%	\$25
Voya 529 Age 18+ Option	0.37%	0.05%	0.08%	1.00%	1.50%	None	1.00%	\$25
American Century Small Cap Value Option	0.88%	0.05%	0.08%	1.00%	2.01%	None	1.00%	\$25
BlackRock Global Allocation Option	0.87%	0.05%	0.08%	1.00%	2.00%	None	1.00%	\$25
Fidelity Global ex-US Index Option	0.06%	0.05%	0.08%	1.00%	1.19%	None	1.00%	\$25
Fidelity U.S. Bond Index Option	0.03%	0.05%	0.08%	1.00%	1.16%	None	1.00%	\$25
Voya Corporate Leaders [®] 100 Option	0.49%	0.05%	0.08%	1.00%	1.62%	None	1.00%	\$25
Voya GNMA Income Option	0.54%	0.05%	0.08%	1.00%	1.67%	None	1.00%	\$25
Voya High Yield Bond Option	0.68%	0.05%	0.08%	1.00%	1.81%	None	1.00%	\$25
Voya Intermediate Bond Option	0.36%	0.05%	0.08%	1.00%	1.49%	None	1.00%	\$25
Voya Large Cap Growth Option	0.58%	0.05%	0.08%	1.00%	1.71%	None	1.00%	\$25
Voya Large Cap Value Option	0.61%	0.05%	0.08%	1.00%	1.74%	None	1.00%	\$25
Voya Mid Cap Opportunities Option	0.93%	0.05%	0.08%	1.00%	2.06%	None	1.00%	\$25
Voya Multi-Manager International Equity Option	0.88%	0.05%	0.08%	1.00%	2.01%	None	1.00%	\$25
Voya Multi-Manager Mid Cap Value Option	0.78%	0.05%	0.08%	1.00%	1.91%	None	1.00%	\$25
Voya Small Cap Growth Option	0.95%	0.05%	0.08%	1.00%	2.08%	None	1.00%	\$25

Class C1

	Annual Asset Based Fees – As of May 7, 2026					Additional Investor Expenses		
	Estimated Underlying Investment Expenses	Board Fee ²	Program Manager Fee	Distribution and Service Fee ³	Total Annual Asset-Based Fees	Maximum Initial Sales Charge	Maximum Deferred Sales Charge	Annual Account Maintenance Fee
Nuveen Balanced Option	0.06%	0.05%	0.08%	0.50%	0.69%	None	0.50%	\$25
Nuveen Equity Index Option	0.05%	0.05%	0.08%	0.50%	0.68%	None	0.50%	\$25
Nuveen Small-Cap Blend Index Option	0.06%	0.05%	0.08%	0.50%	0.69%	None	0.50%	\$25

Class W

	Annual Asset Based Fees – As of May 7, 2026					Additional Investor Expenses		
	Estimated Underlying Investment Expenses	Board Fee ²	Program Manager Fee	Distribution and Service Fee	Total Annual Asset-Based Fees	Maximum Initial Sales Charge	Maximum Initial Sales Charge	Annual Account Maintenance Fee
Voya 529 Aggressive Growth Option	0.43%	0.05%	0.08%	None	0.56%	None	None	\$25
Voya 529 Growth Plus Option	0.44%	0.05%	0.08%	None	0.57%	None	None	\$25
Voya 529 Balanced Option	0.43%	0.05%	0.08%	None	0.56%	None	None	\$25
Voya 529 Conservative Plus Option	0.42%	0.05%	0.08%	None	0.55%	None	None	\$25
Voya 529 Ultra Conservative Option	0.41%	0.05%	0.08%	None	0.54%	None	None	\$25
Voya 529 Age 0-4 Option	0.45%	0.05%	0.08%	None	0.58%	None	None	\$25

	Annual Asset Based Fees – As of May 7, 2026					Additional Investor Expenses		
	Estimated Underlying Investment Expenses	Board Fee ²	Program Manager Fee	Distribution and Service Fee	Total Annual Asset-Based Fees	Maximum Initial Sales Charge	Maximum Initial Sales Charge	Annual Account Maintenance Fee
Voya 529 Age 5-8 Option	0.44%	0.05%	0.08%	None	0.57%	None	None	\$25
Voya 529 Age 9-10 Option	0.44%	0.05%	0.08%	None	0.57%	None	None	\$25
Voya 529 Age 11-12 Option	0.44%	0.05%	0.08%	None	0.57%	None	None	\$25
Voya 529 Age 13-14 Option	0.42%	0.05%	0.08%	None	0.55%	None	None	\$25
Voya 529 Age 15 Option	0.41%	0.05%	0.08%	None	0.54%	None	None	\$25
Voya 529 Age 16 Option	0.41%	0.05%	0.08%	None	0.54%	None	None	\$25
Voya 529 Age 17 Option	0.41%	0.05%	0.08%	None	0.54%	None	None	\$25
Voya 529 Age 18+ Option	0.37%	0.05%	0.08%	None	0.50%	None	None	\$25
American Century Small Cap Value Option	0.88%	0.05%	0.08%	None	1.01%	None	None	\$25
BlackRock Global Allocation Option	0.87%	0.05%	0.08%	None	1.00%	None	None	\$25
Fidelity Global ex-US Index Option	0.06%	0.05%	0.08%	None	0.19%	3.50%	None	\$25
Fidelity U.S. Bond Index Option	0.03%	0.05%	0.08%	None	0.16%	3.50%	None	\$25
Nuveen Balanced Option	0.06%	0.05%	0.08%	None	0.19%	None	None	\$25
Nuveen Equity Index Option	0.05%	0.05%	0.08%	None	0.18%	None	None	\$25
Nuveen Small-Cap Blend Index Option	0.06%	0.05%	0.08%	None	0.19%	None	None	\$25
Voya Corporate Leaders [®] 100 Option	0.49%	0.05%	0.08%	None	0.62%	None	None	\$25
Voya GNMA Income Option	0.54%	0.05%	0.08%	None	0.67%	None	None	\$25
Voya High Yield Bond Option	0.68%	0.05%	0.08%	None	0.81%	None	None	\$25
Voya Intermediate Bond Option	0.36%	0.05%	0.08%	None	0.49%	None	None	\$25
Voya Large Cap Growth Option	0.58%	0.05%	0.08%	None	0.71%	None	None	\$25
Voya Large Cap Value Option	0.61%	0.05%	0.08%	None	0.74%	None	None	\$25
Voya Mid Cap Opportunities Option	0.93%	0.05%	0.08%	None	1.06%	None	None	\$25
Voya Multi-Manager International Equity Option	0.88%	0.05%	0.08%	None	1.01%	None	None	\$25
Voya Multi-Manager Mid Cap Value Option	0.78%	0.05%	0.08%	None	0.91%	None	None	\$25
Voya Small Cap Growth Option	0.95%	0.05%	0.08%	None	1.08%	None	None	\$25

1. The annual account maintenance fee will be waived for accounts for which either the Account Owner or the Beneficiary is a Wisconsin resident based on the address of record. The annual fee will also be waived, regardless of residency, in the following circumstances: (1) if the account balance is greater than \$25,000; (2) if there is an AIP or payroll direct deposit of \$25 per month in an Option selected for investment (active for the 12 previous months without interruption); or (3) for accounts established by employees of the Program Manager and its affiliates.
2. The Board Fee is a fee that the Board may collect for the administrative services to the Plan. The net 0.05% Board Fee is the result of a voluntary 0.05% waiver of the Board Fee. If the waiver is no longer in effect, the Board Fee would be 0.10% of the average net assets of each Investment Option.
3. Ongoing payments to dealers of the Annual Distribution and Service Fee will generally be made monthly at rates that are based on the average daily net assets held in an Account Owner's account that designates a dealer of record. Rights to these ongoing payments generally begin in the 13th month following a purchase of No Class units, Class A units, Class C units and Class C1 units.
4. There is no front-end sales charge if you purchase Class A units in an amount of \$1 million or more. For Class A units purchased prior to February 1, 2021, the maximum sales charge for Class A units was 4.75% for purchases between \$0 to \$999,999 and 0.00% for purchases over \$1,000,000.
5. If you sell (redeem) your Class A units within 18 months that were purchased with the initial sales charge waived, you will pay a CDSC of 1.00% of your purchase price.
6. Class AR units convert to Class A units at the beginning of the second year following the Qualified Rollover from a Class A units of another 529 plan.
7. Effective February 1, 2021 Class C units will automatically convert to Class A units at the beginning of the sixth year of ownership in the same month of the original purchase, at which time the annual distribution and service fee will be reduced to 0.25%.

APPENDIX F: APPROXIMATE COST OF A \$10,000 CONTRIBUTION – EFFECTIVE MAY 7, 2026

The following tables compare the approximate cost of investing in the different share classes under the Tomorrow's Scholar® 529 Plan over different periods of time. The Examples show estimated costs if you sold (redeemed) your shares at the end of the period or continued to hold them. Your actual cost may be higher or lower than the amounts shown. The Examples are based on the following assumptions:

- A \$10,000 contribution invested for the time periods shown.
- A 5% annually compounded rate of return on the net amount invested throughout the period.
- All shares are redeemed at the end of the period shown for Qualified Education Expenses (the tables do not consider the impact of any potential state or federal taxes on the redemption).
- Total annual asset-based fees, including underlying investment and fund expenses, remain the same as those shown in previous fee structure table.
- Expenses for each Option include the entire annual account maintenance fee of \$25.
- The investor pays the applicable maximum up-front sales charge (without regard to possible breakpoints) in the current Class A fee structure and any CDSCs applicable to shares invested for the applicable periods in the Class C fee structure.

The total estimated fees and expenses in the table below do not include the annual account maintenance fee or sales charges. Please refer to the table "Examples of investment costs", which shows the approximate cost of investing in each of the Options over one-, three-, five-, and ten-year periods, including the \$25 annual account maintenance fee and sales charges.

Investment Option	Class	Status		Number of Years You Own Your Units			
				1 Year	3 Years	5 Years	10 Years
Voya 529 Aggressive Growth Option	Class A	Sold or Held	\$	455	674	906	1,555
	Class C	Sold	\$	283	566	970	1,619
	Class C	Held	\$	183	566	970	1,619
	Class W	Sold or Held	\$	82	254	436	943
Voya 529 Growth Plus Option	Class A	Sold or Held	\$	456	677	911	1,566
	Class C	Sold	\$	284	569	975	1,630
	Class C	Held	\$	184	569	975	1,630
	Class W	Sold or Held	\$	83	257	441	956
Voya 529 Balanced Option	Class A	Sold or Held	\$	455	674	906	1,545
	Class C	Sold	\$	283	566	970	1,619
	Class C	Held	\$	183	566	970	1,619
	Class W	Sold or Held	\$	82	254	436	943
Voya 529 Conservative Plus Option	Class A	Sold or Held	\$	454	671	901	1,544
	Class C	Sold	\$	282	563	965	1,607
	Class C	Held	\$	182	563	965	1,607
	Class W	Sold or Held	\$	81	251	430	931
Voya 529 Ultra Conservative Option	Class A	Sold or Held	\$	453	668	896	1,533
	Class C	Sold	\$	281	560	959	1,596
	Class C	Held	\$	181	560	959	1,596
	Class W	Sold or Held	\$	80	247	425	919
Voya 529 Age 0-4 Option	Class A	Sold or Held	\$	457	680	917	1,578
	Class C	Sold	\$	286	572	980	1,641
	Class C	Held	\$	186	572	980	1,641
	Class W	Sold or Held	\$	84	260	447	968
Voya 529 Age 5-8 Option	Class A	Sold or Held	\$	456	677	911	1,566
	Class C	Sold	\$	284	569	975	1,630
	Class C	Held	\$	184	569	975	1,630
	Class W	Sold or Held	\$	83	257	441	956
Voya 529 Age 9-10 Option	Class A	Sold or Held	\$	456	677	911	1,566
	Class C	Sold	\$	281	569	975	1,630
	Class C	Held	\$	184	569	975	1,630
	Class W	Sold or Held	\$	83	257	441	956
Voya 529 Age 11-12 Option	Class A	Sold or Held	\$	456	677	911	1,566
	Class C	Sold	\$	281	569	975	1,630
	Class C	Held	\$	184	569	975	1,630
	Class W	Sold or Held	\$	83	257	441	956
Voya 529 Age 13-14 Option	Class A	Sold or Held	\$	454	671	901	1,544
	Class C	Sold	\$	282	563	965	1,607
	Class C	Held	\$	182	563	965	1,607
	Class W	Sold or Held	\$	81	251	430	931
Voya 529 Age 15 Option	Class A	Sold or Held	\$	453	668	896	1,533
	Class C	Sold	\$	281	560	959	1,596
	Class C	Held	\$	181	560	959	1,596

Investment Option	Class	Status		Number of Years You Own Your Units			
				1 Year	3 Years	5 Years	10 Years
Voya 529 Age 16 Option	Class W	Sold or Held	\$	80	247	425	919
	Class A	Sold or Held	\$	453	668	896	1,533
	Class C	Sold	\$	281	560	959	1,596
	Class C	Held	\$	181	560	959	1,596
Voya 529 Age 17 Option	Class W	Sold or Held	\$	80	247	425	919
	Class A	Sold or Held	\$	453	668	896	1,533
	Class C	Sold	\$	281	560	959	1,596
	Class C	Held	\$	181	560	959	1,596
Voya 529 Age 18+ Option	Class W	Sold or Held	\$	80	247	425	919
	Class A	Sold or Held	\$	449	655	875	1,487
	Class C	Sold	\$	277	547	939	1,551
	Class C	Held	\$	177	547	939	1,551
American Century Small Cap Value Option	Class W	Sold or Held	\$	76	235	403	871
	Class A	Sold or Held	\$	499	809	1,138	2,052
	Class C	Sold	\$	329	703	1,201	2,114
	Class C	Held	\$	229	703	1,201	2,114
BlackRock Global Allocation Option	Class W	Sold or Held	\$	128	395	680	1,472
	Class A	Sold or Held	\$	498	806	1,133	2,041
	Class C	Sold	\$	328	700	1,196	2,104
	Class C	Held	\$	228	700	1,196	2,104
Fidelity Global ex-US Index Option	Class W	Sold or Held	\$	127	392	674	1,461
	Class A	Sold or Held	\$	418	561	711	1,129
	Class C	Sold	\$	246	451	775	1,193
	Class C	Held	\$	146	451	775	1,193
Fidelity U.S. Bond Index Option	Class W	Sold or Held	\$	44	136	231	490
	Class A	Sold or Held	\$	415	552	695	1,094
	Class C	Sold	\$	243	442	760	1,158
	Class C	Held	\$	143	442	760	1,158
Nuveen Balanced Option	Class W	Sold or Held	\$	41	126	215	452
	Class A	Sold or Held	\$	418	561	711	1,129
	Class C1	Sold	\$	145	295	507	1,099
	Class C1	Held	\$	95	295	507	1,099
Nuveen Equity Index Option	Class W	Sold or Held	\$	44	136	231	490
	Class A	Sold or Held	\$	417	558	706	1,117
	Class C1	Sold	\$	144	292	501	1,087
	Class C1	Held	\$	94	292	501	1,087
Nuveen Small-Cap Blend Index Option	Class W	Sold or Held	\$	43	133	226	477
	Class A	Sold or Held	\$	418	561	711	1,129
	Class C1	Sold	\$	145	295	507	1,099
	Class C1	Held	\$	95	295	507	1,099
TIAA-CREF Principal Protection Option	Class W	Sold or Held	\$	44	136	231	490
Voya Corporate Leaders® 100 Option	Class W	Sold or Held	\$	43	133	226	477
	Class A	Sold or Held	\$	461	692	937	1,623
	Class C	Sold	\$	290	584	1,001	1,686
	Class C	Held	\$	190	584	1,001	1,686
Voya GNMA Income Option	Class W	Sold or Held	\$	88	273	469	1,015
	Class A	Sold or Held	\$	465	707	963	1,679
	Class C	Sold	\$	295	600	1,027	1,742
	Class C	Held	\$	195	600	1,027	1,742
Voya High Yield Bond Option	Class W	Sold or Held	\$	93	289	496	1,075
	Class A	Sold or Held	\$	479	749	1,036	1,834
	Class C	Sold	\$	309	642	1,099	1,897
	Class C	Held	\$	209	642	1,099	1,897
Voya Intermediate Bond Option	Class W	Sold or Held	\$	108	333	572	1,240
	Class A	Sold or Held	\$	448	652	870	1,476
	Class C	Sold	\$	276	544	933	1,539
	Class C	Held	\$	176	544	933	1,539
Voya Large Cap Growth Option	Class W	Sold or Held	\$	75	232	398	859
	Class A	Sold or Held	\$	469	719	984	1,723
	Class C	Sold	\$	299	612	1,048	1,787
	Class C	Held	\$	199	612	1,048	1,787
Voya Large Cap Value Option	Class W	Sold or Held	\$	97	301	518	1,122
	Class A	Sold or Held	\$	472	728	1,000	1,757
	Class C	Sold	\$	302	621	1,063	1,820
	Class C	Held	\$	202	621	1,063	1,820

Investment Option	Class	Status		Number of Years You Own Your Units			
				1 Year	3 Years	5 Years	10 Years
Voya Mid Cap Opportunities Option	Class W	Sold or Held	\$	100	311	534	1,158
	Class A	Sold or Held	\$	504	824	1,164	2,105
	Class C	Sold	\$	334	718	1,227	2,168
	Class C	Held	\$	234	718	1,227	2,168
Voya Multi-Manager International Equity Option	Class W	Sold or Held	\$	133	411	706	1,529
	Class A	Sold or Held	\$	499	809	1,138	2,052
	Class C	Sold	\$	329	703	1,201	2,114
	Class C	Held	\$	229	703	1,201	2,114
Voya Multi-Manager Mid Cap Value Option	Class W	Sold or Held	\$	128	395	680	1,472
	Class A	Sold or Held	\$	489	779	1,087	1,943
	Class C	Sold	\$	319	673	1,150	2,006
	Class C	Held	\$	219	673	1,150	2,006
Voya Small Cap Growth Option	Class W	Sold or Held	\$	118	364	626	1,357
	Class A	Sold or Held	\$	506	830	1,174	2,127
	Class C	Sold	\$	336	724	1,237	2,189
	Class C	Held	\$	236	724	1,237	2,189
	Class W	Sold or Held	\$	135	417	717	1,552

FINANCIAL INTERMEDIARY SPECIFIC SALES CHARGE WAIVERS AND RELATED DISCOUNT POLICY INFORMATION

Intermediary-Defined Sales Charge Waiver Policies

The availability of certain initial or deferred sales charge waivers and discounts may depend on the particular financial intermediary or type of account through which you purchase or hold units in the 529 Plan.

Intermediaries may have different policies and procedures regarding the availability of front-end sales load waivers or contingent deferred (back-end) sales load (“CDSC”) waivers, which are discussed below. In all instances, it is the purchaser’s responsibility to notify the 529 Plan or the purchaser’s financial intermediary at the time of purchase of any relationship or other facts qualifying the purchaser for sales charge waivers or discounts. For waivers and discounts not available through a particular intermediary, account owners will have to purchase units directly from the 529 Plan or through another intermediary to receive these waivers or discounts if applicable.

Accounts maintained through certain firms are not eligible for the sales charge waiver, noted in this Program Description and Participation Agreement, for purchases from the proceeds of a redemption of Class A units of the same Option within 60 days of the date of redemption. Investors wishing to utilize this privilege will need to do so through an account held directly with the Plan or a financial intermediary that supports this feature.

EDWARD D. JONES & CO., L.P. (“EDWARD JONES”)

Policies Regarding Transactions Through Edward Jones

The following information has been furnished by Edward Jones. Neither Voya Investments Distributor, LLC nor Tomorrow’s Scholar 529 Plan has independently verified such information.

Effective on or after September 3, 2024, the following information supersedes prior information with respect to transactions and positions held in the account through an Edward Jones system. Clients of Edward Jones (also referred to as “account owners”) purchasing 529 Plan units on the Edward Jones commission and fee-based platforms are eligible only for the following sales charge discounts (also referred to as “breakpoints”) and waivers, which can differ from discounts and waivers described elsewhere in the 529 Plan Description or through another broker-dealer. In all instances, it is the account owner’s responsibility to inform Edward Jones at the time of purchase of any relationship, holdings of 529 Plans where Voya serves as the primary distributor, and Voya funds or other facts qualifying the purchaser for discounts or waivers. Edward Jones can ask for documentation of such circumstance. Account owners should contact Edward Jones if they have questions regarding their eligibility for these discounts and waivers.

Breakpoints

- Breakpoint pricing, otherwise known as volume pricing, will be at dollar thresholds as described in the 529 Plan Description.

Rights of Accumulation (ROA)

- The applicable sales charge on a purchase of Class A units is determined by taking into account all classes of the 529 Plans (except certain money market funds and any assets held in group retirement plans) where Voya serves as the primary distributor and Voya funds held by the account owner or in an account grouped by Edward Jones with other accounts for the purpose of providing certain pricing considerations (“pricing groups”). This includes all units held on the Edward Jones platform and/or held on another platform. The inclusion of eligible fund family assets in the ROA calculation is dependent on the account owner notifying Edward Jones of such assets at the time of calculation. Money market funds are included only if such shares were sold with a sales charge at the time of purchase or acquired in exchange for shares purchased with a sales charge.
- The employer maintaining a SEP IRA plan and/or SIMPLE IRA plan may elect to establish or change ROA for the IRA accounts associated with the plan to a plan-level grouping as opposed to including all share classes at an account owner or pricing group level.
- ROA is determined by calculating the higher of cost minus redemptions or market value (current units x NAV).

Letter of Intent (“LOI”)

- Through a LOI, account owners can receive the sales charge and breakpoint discounts for purchases account owners intend to make over a 13-month period from the date Edward Jones receives the LOI. The LOI is determined by calculating the higher of cost or market value of qualifying holdings at LOI initiation in combination with the value that the account owner intends to buy over a 13-month period to calculate the front-end sales charge and any breakpoint discounts. Each purchase the account owner makes during that 13-month period will receive the sales charge and breakpoint discount that applies to the total amount. The inclusion of eligible fund family assets in the LOI calculation is dependent on the account owner notifying Edward Jones of such assets at the time of calculation. Purchases made before the LOI is received by Edward Jones are not adjusted under the LOI and will not reduce the sales charge previously paid. Sales charges will be adjusted if LOI is not met.
- If the employer maintaining a SEP IRA plan and/or SIMPLE IRA plan has elected to establish or change ROA for the IRA accounts associated with the plan to a plan-level grouping, LOIs will also be at the plan level and may only be established by the employer.

Sales Charge Waivers

Sales charges are waived for the following account owners and in the following situations:

- Associates of Edward Jones and its affiliates and other accounts in the same pricing group (as determined by Edward Jones under its policies and procedures) as the associate. This waiver will continue for the remainder of the associate's life if the associate retires from Edward Jones in good-standing and remains in good standing pursuant to Edward Jones' policies and procedures.
- Units purchased in an Edward Jones fee-based program.
- Units purchased through reinvestment of capital gains distributions and dividend reinvestment.
- Units purchased from the proceeds of redeemed units of the same 529 Plan so long as the following conditions are met: 1) the proceeds are from the sale of units within 60 days of the purchase; and 2) the sale and purchase are made in the same Option and the same account or the purchase is made in an individual account ("Right of Reinstatements"). The Right of Reinstatements excludes systematic or automatic transactions including, but not limited to, purchases made through payroll deductions.
- Units exchanged into Class A units from another class so long as the exchange is into the same Option and was initiated at the discretion of Edward Jones. Edward Jones is responsible for any remaining CDSC due to the 529 Plan, if applicable. Any future purchases are subject to the applicable sales charge as disclosed in the Program Description.
- Exchanges from Class C units to Class A units of the same 529 Plan, generally, in the 84th month following the anniversary of the purchase date or earlier at the discretion of Edward Jones.
- Purchases of Class A units through a rollover from either another education savings plan or a security used for qualified distributions.
- Purchases of Class 529 units made for recontribution of refunded amounts.

Contingent Deferred Sales Charge (CDSC) Waivers

If the account owner purchases units that are subject to a CDSC and those units are redeemed before the CDSC expires, the account owner is responsible to pay the CDSC except in the following conditions:

- The death or disability of the account owner or beneficiary.
- Systematic withdrawals with up to 10% per year of the account value.
- Return of excess contributions from an Individual Retirement Account (IRA).
- Units redeemed as part of a required minimum distribution for IRA and retirement accounts if the redemption is taken in or after the year the account owner reaches qualified age based on applicable IRS regulations.
- Units redeemed to pay Edward Jones fees or costs in such cases where the transaction is initiated by Edward Jones.
- Units exchange in an Edward Jones fee-based program
- Units acquired through NAV reinstatement.
- Units redeemed at the discretion of Edward Jones for Minimums Balances, as described below.

Other Important Information Regarding Transactions Through Edward Jones

Minimum Purchase Amounts

- Initial purchase minimum: \$250
- Subsequent purchase minimum: none

Minimum Balances

- Edward Jones has the right to redeem at its discretion 529 Plan holdings with a balance of \$250 or less. The following are examples of accounts that are not included in this policy:
 - A fee-based account held on an Edward Jones platform
 - A 529 account held on an Edward Jones platform
 - An account with an active systematic investment plan or LOI

Exchanging Share Classes

- At any time it deems necessary, Edward Jones has the authority to exchange at NAV an account owner's holdings in an Option to Class A.

RAYMOND JAMES & ASSOCIATES, INC., RAYMOND JAMES FINANCIAL SERVICES, INC. and each entity's affiliates ("RAYMOND JAMES")

The following information has been furnished by Raymond James. Neither Voya Investments Distributor, LLC nor Tomorrow's Scholar 529 Plan has independently verified such information.

Account owners purchasing units through a Raymond James platform or account, or through an introducing broker-dealer or independent registered investment adviser for which Raymond James provides trade execution, clearance, and/or custody services, will be eligible only for the following load waivers (front-end sales charge waivers and contingent deferred, or back-end, sales charge waivers) and discounts, which may differ from those disclosed elsewhere in this 529 Plan's Program Description.

Front-end sales load waivers on Class A units available at Raymond James

- Units purchased in an investment advisory program.
- Units purchased within the same 529 Plan through a systematic reinvestment of capital gains and dividend distributions.

- Employees and registered representatives of Raymond James or its affiliates and their family members as designated by Raymond James.
- Units purchased from the proceeds of redemptions within the same 529 Plan, provided: (1) the repurchase occurs within 90 days following the redemption; (2) the redemption and purchase occur in the same account; and (3) redeemed units were subject to a front-end or deferred sales load (known as Rights of Reinstatement).
- An account owner in the 529 Plan's Class C units will have their units converted at net asset value to Class A units (or the appropriate unit class) of the 529 Plan if the units are no longer subject to a CDSC and the conversion is in line with the policies and procedures of Raymond James.

CDSC Waivers on Classes A, and C units available at Raymond James

- Death or disability of the account owner.
- Units sold as part of a systematic withdrawal plan as described in the 529 Plan's Program Description.
- Units sold to pay Raymond James fees but only if the transaction is initiated by Raymond James.
- Units acquired through a Right of Reinstatement.
- Front-end load discounts available at Raymond James: breakpoints, rights of accumulation, Breakpoints as described in this 529 Plan's Program Description Rights of accumulation which entitle account owners to breakpoint discounts will be automatically calculated based on the aggregated holding of 529 Plan assets held by accounts within the purchaser's household at Raymond James. Eligible 529 Plan assets not held at Raymond James may be included in the calculation of rights of accumulation only if the account owner notifies his or her financial intermediary about such assets.

MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED ("MERRILL")

The following information has been furnished by Merrill. Neither Voya Investments Distributor, LLC nor Tomorrow's Scholar 529 Plan has independently verified such information.

If you establish or hold your 529 Plan (Plan) account on the Merrill omnibus platform, the features and policies related to unit class sales charges (including contingent deferred sales charges (CDSC), if any), unit class sales charge waivers or discounts, letters of intent (LOI) and reinstatement privileges, and Class C unit conversion period will be different than referenced in this 529 Plan Description and will be governed by the Merrill 529 Account Unit Class Disclosure and Terms and Conditions (T&Cs) provided to you by Merrill prior to establishing your account.

Except as described in this Merrill specific section of this Plan Program Description and the T&Cs, Merrill does not offer any initial sales charge discounts, CDSC waivers, LOI or reinstatement privileges (the "Discounts, Waivers, and Privileges") in the 529 plans offered on the Merrill omnibus platform. To receive the Discounts, Waiver, and Privileges not offered by Merrill, you will have to invest in the Plan directly or through another intermediary.

Before investing in the Plan through Merrill, you should consider the potential benefits and importance to you of such Discounts, Waivers, and Privileges.

For additional information on the Discounts, Waivers, and Privileges and Merrill's policies, contact a Merrill advisor or refer to the T&C.

If you establish or hold your Plan account on the Merrill omnibus platform, then the unit class your account will purchase will generally be based on your eligible assets or meeting other eligibility criteria as set forth in the T&Cs. 529 plans offered by Merrill on its omnibus platform typically will have two unit classes – Class A Unit and Class C Unit (or their equivalents) – each with its own fee and expense structure. Each account will purchase a specific unit class when an initial or subsequent contribution is credited to the account. The unit class will be automatically determined at the time of the contribution based on the participant's eligible assets and/or meeting other eligibility criteria. You will not be able to select the unit class. Among other things, Class C units (or their equivalents) generally will be automatically converted to Class A units (not subject to an initial sales charge) after four years from their respective dates of purchase. If the Program Description permits Class C units' (or their equivalents') conversion sooner than four years, such earlier conversion date will automatically apply.

Age-Based Option reinvestments for account owners purchasing units through a Merrill platform or account

For account owners investing in Age-Based Options through the Merrill platform, the automatic reinvestments which occur as the Beneficiary ages to the next age band, will occur, when applicable, on the day following the day of the Beneficiary's birth date.

Please contact your Merrill advisor with any questions or to request a copy of the T&Cs.

WELLS FARGO CLEARING SERVICES, LLC AND WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC (COLLECTIVELY, "WELLS FARGO ADVISORS")

Wells Fargo Clearing Services, LLC operates a First Clearing business, but these rules are not intended to include First Clearing firms.

Effective April 1, 2026, Clients of Wells Fargo Advisors purchasing units through Wells Fargo Advisors are eligible for the following sales charge discounts (also referred to as "breakpoints") and waivers, which can differ from discounts and waivers described elsewhere in this 529 Plan's Program Description. In all instances, it is the investor's responsibility to inform Wells Fargo Advisors at the time of

purchase of any relationship, holdings, or other facts qualifying the investor for discounts or waivers. Wells Fargo Advisors can ask for documentation supporting the qualification.

Wells Fargo Advisors Class A unit front-end sales charge waivers information

Wells Fargo Advisors clients purchasing or converting to Class A units of the 529 Plan in a Wells Fargo Advisors brokerage account are entitled to a waiver of the front-end load in the following circumstances:

- Wells Fargo Advisors employee and employee-related accounts according to Wells Fargo Advisor's employee account linking rules. Legacy accounts and positions receiving affiliate discounts prior to the effective date will continue to receive discounts. Going forward employees of affiliate businesses will not be offered NAV.
- Units purchased through reinvestment of dividends and capital gains distributions when purchasing units of the same 529 Plan.

WellsTrade, the firm's online self-directed brokerage account, generally offers no load unit classes but there could be instances where a Class A unit is offered without a front-end sales charge.

Wells Fargo Advisors Class 529-A unit front-end sales charge waivers information

Wells Fargo Advisors clients purchasing or converting to Class 529-A units of the 529 Plan through Wells Fargo Advisors transactional brokerage accounts are entitled to a waiver of the front-end load in the following circumstances:

- Units purchased through a rollover from another 529 plan.
- Recontribution(s) of distributed funds are only allowed during the NAV reinstatement period as dictated by the sponsor's specifications outlined by the plan.

Wells Fargo Advisors is not able to apply the NAV Reinstatement privilege for 529 Plan account purchases placed directly at the fund company. Investors wishing to utilize this privilege outside of Wells Fargo systems will need to do so directly with the Plan or a financial intermediary that supports this feature.

Unless specifically described above, other front-end load waivers are not available on mutual fund purchases through Wells Fargo Advisors.

Wells Fargo Advisors Contingent Deferred Sales Charge information

- CDSC imposed on fund redemptions will not be rebated based on future purchases.

Wells Fargo Advisors Class A front-end load discounts

Wells Fargo Advisors Clients purchasing Class A units of the 529 Plan through Wells Fargo Advisors brokerage accounts will follow the following aggregation rules for breakpoint discounts:

- Effective April 1, 2026, SEP or SIMPLE IRAs will not be aggregated as a group plan. They will aggregate with the client's personal accounts based on Social Security Number. Previously established SEP and SIMPLE IRAs may still be aggregated as a group plan.
- Effective April 1, 2026, Employer-sponsored retirement plan (e.g., 401(k) plans, 457 plans, employer-sponsored 403(b) plans, profit sharing and money purchase pension plans and defined benefit plans) accounts will aggregate with other plan accounts under the same Tax ID and will not be aggregated with other retirement plan accounts under a different Tax ID or personal accounts. For purposes of this provision, employer-sponsored retirement plans do not include SEP IRAs, SIMPLE IRAs, SAR-SEPs or Keogh plans.
- Gift of units will not be considered when determining breakpoint discounts.

APPENDIX H - PARTICIPATION AGREEMENT

This Participation Agreement is entered into between the person ("Participant" or "Account Owner") whose name and signature appear on the attached account application form ("Application"), the Wisconsin College Savings Program Board ("Board"), and the State of Wisconsin ("State"), acting as trustee ("Trustee") of the Wisconsin College Savings Program Trust Fund ("Trust"), an advisor-sold College Savings Program ("Advisor Program") created by 1995 Wisconsin Act 403, which was amended by 1999 Wisconsin Act 44, 2005 Wisconsin Act 479, 2011 Wisconsin Act 32, 2013 Wisconsin Act 227, 2017 Wisconsin Act 59, and 2017 Wisconsin Act 231 (the "Act"), and Section 529 of the United States Internal Revenue Code of 1986, as amended from time to time ("Code").

By executing an Application, the State, the Board, and the Participant agree as follows:

1. General information. The Advisor Program was established so that persons may make contributions to accounts ("Accounts") established for the purpose of meeting the Qualified Education Expenses of designated beneficiaries ("Designated Beneficiaries") of the Accounts.

2. Establishment of accounts. The Participant requests the Board to establish one or more Accounts for the sole purpose of funding the Qualified Education Expenses of the Designated Beneficiary set forth in the Application. Voya Investments Distributor, LLC ("the Distributor") and Voya Funds Services, LLC and certain of their affiliates (collectively, "Voya") will establish the Account or Accounts, effective on receipt and accepted by the Advisor Program of the completed Application and the minimum initial contribution required for each Account. Each Account will be governed by this Participation Agreement and the applicable Advisor Program rules, as set forth in Chapter Adm 81 of the Wisconsin Administrative Code. Account assets will be held, subject to the Act and the Code, for the exclusive benefit of the Participant and the Designated Beneficiary.

3. Contributions to accounts.

(a) Required initial contribution. The Participant will make an initial contribution of at least \$250 per Option selected to each Account at the time the Account is opened. The minimum initial contribution will be waived if the Participant participates in an AIP or payroll direct deposit, in which case the minimum initial contribution is \$25 per Option selected.

(b) Additional contributions. The Participant may make additional minimum contributions of \$25 or more per Option to any Account at any time, subject to the maximum limits on contributions described below.

(c) Acceptable contribution methods. Contributions to an Account may be made via check, wire transfer, electronic funds transfer, or any other method permitted by the Act and the Code. Qualified Rollover contributions to an Account from another 529 Plan must be accompanied by the Incoming Rollover form.

(d) Maximum permissible contributions. The Board from time to time will establish limits on the amount of contributions that may be made to Accounts for any one Designated Beneficiary, as required by the Code, the Act, and applicable rules. Contributions in excess of those limits will not be accepted and will be returned to the contributor.

(e) Right to refuse contributions. Contributions may be refused, in whole or in part, if the Board or Voya reasonably believes that the purpose is for other than funding the Qualified Education Expenses of the Designated Beneficiary of an Account.

4. Designation of Designated Beneficiary; change of Designated Beneficiary. The Participant will name a Designated Beneficiary for each Account on the Application. The Participant may change the Designated Beneficiary of any Account, provided that the new Designated Beneficiary is a Member of the Family, within the meaning of the Code, of the current Designated Beneficiary. To change a Designated Beneficiary, the Participant must complete and sign a Change of Registration form. The change will be effective when Voya has received and processed the Change of Registration form. A change of Designated Beneficiary will result in the assignment of a new Account number and may result in the reallocation of the Account's assets to an appropriate Option.

5. Distributions from accounts; termination of accounts.

(a) Distributions from Accounts. Investments in Accounts are voluntary. The Participant may direct distributions from an Account by providing the Advisor Program with a Withdrawal Request form and any additional information or documentation required by the State, the Board, or Voya.

(b) Tax on Non-Qualified Withdrawals. The earnings portion of Non-Qualified Withdrawals will be subject to all applicable federal and state and/or local income taxes, possibly including the additional 10% federal tax, for which the Participant or distributee shall be liable.

(c) Termination of Accounts. The Participant, the Board, or the State may terminate an Account as provided under the Act, the Code, or the Advisor Program rules. If the Board, the State, or Voya finds that the Participant or a Designated Beneficiary has provided false or misleading information to the Board or an Eligible Educational Institution with respect to an Account, the Board or the State may terminate the Account. The remaining Account balance may be distributed to the Participant, and earnings will be subject to all applicable federal and state and/or income taxes, possibly including the additional 10% federal tax, for which the Participant or distributee shall be liable.

6. Participant's representations. The Participant represents and agrees as follows:

(a) The Participant understands that the value of an Account will increase or decrease, based on the investment performance of the Option(s) in which Account assets are then invested; that each Option will invest in mutual funds or other investments selected by the Board; that the value of an Account may be more or less than the amount invested in the Account; and that all contributions to an Account are subject to investment risks, including the risk of loss of all or part of the Participant's contribution. Except for the initial placement of the funds within one of the available Options, the Participant agrees that all investment decisions for the Options will be made by the Board and that the Participant will not direct the investment of any funds contributed to the Advisor Program, either directly or indirectly. THE PARTICIPANT ACKNOWLEDGES THAT THERE IS NO GUARANTEE OF A RATE OF INTEREST OR RETURN ON ANY ACCOUNT OR OF THE PAYMENT OF PRINCIPAL, INTEREST, OR RETURN ON ANY ACCOUNT, OR THAT THE INTENDED TAX ADVANTAGES FOR THE ACCOUNT MAY BE AFFECTED BY FUTURE CHANGES IN TAX LAWS, REGULATIONS, OR RULES.

(b) The Participant is required to select an Option for each Account from among the choices provided on the Application. The Participant understands that the funds within an Account may be transferred from one Option to another Option only twice per calendar year and upon a change in the Designated Beneficiary to a member of the family (as defined in the Code) of the current Designated Beneficiary, except as

permitted by the Code and any applicable regulations, rules, announcements, notices, or other guidance issued thereunder. The Participant understands that only the Board will have the authority to make decisions concerning the investments in which the Options will invest.

(c) The Participant understands that participation in the Trust does not guarantee that any Designated Beneficiary (i) will be admitted as a student to any educational institution; (ii) if accepted, will be permitted to continue as a student; (iii) will graduate from any educational institution; (iv) will be treated as a state resident of any state for tuition purposes; or (v) will achieve any particular treatment under applicable federal or state financial aid programs. Further, the Participant understands that participation in the Trust does not guarantee in-state tuition rates.

(d) The Participant will not use an Account as collateral for any loan and agrees that any attempted use of an Account as collateral for a loan shall be void.

(e) The Participant will not assign or transfer any interest in any Account except as provided by the Code, the Act, or the Board and agrees that any attempted assignment or transfer of such an interest shall be void.

(f) The Participant understands that the Trust will not lend money or other assets to any Participant or Designated Beneficiary.

(g) The Participant has received, read, and understood the Tomorrow's Scholar® 529 Plan Program Description.

(h) The Advisor Program is established and maintained pursuant to Wisconsin State law and is intended to qualify for certain federal income tax consequences under the Code. Such Wisconsin State laws and the Code are subject to change, and neither the Trust, the State, the Board, nor Voya makes any representations that such Wisconsin State laws or the Code will not be changed or repealed.

(i) The Board or Voya may redeem or close an Account, without the Account Owner's permission, in cases of suspicious, fraudulent, or illegal activity or activity that may otherwise expose the State, the Board, the Advisor Program, or Voya (or its affiliates) to legal, reputational, or other risk. Further, if an Account closure or redemption occurs as a result of the foregoing, any market loss, tax implications, penalties, or other expenses will be solely borne by the Account Owner.

7. Fees and expenses. The Board or the State will make the following charges against the Trust and the Accounts to pay for the costs of managing and administering the Trust and the Accounts:

(a) Daily charges. Each Option of the Trust will be subject to a daily asset-based charge as described in the Program Description.

(b) Fees. Each Account may be subject to fees charged in the amounts and as described in the Program Description.

(c) Financial intermediary fees. Accounts opened through broker/dealers or financial intermediaries and in certain situations sold through the Distributor may be subject to initial and contingent deferred sales charges and will be subject to an ongoing annual charge, as described in the Program Description. In addition, Voya may make additional payments, out of its own assets, as described in the Program Description, to such broker/dealers or financial intermediaries following the opening of an Account.

(d) Audit expenses. Expenses for an independent annual audit of the Trust may be paid by the Options on a pro rata basis.

8. Necessity of qualification. The Advisor Program intends to qualify for favorable federal tax treatment under the Code. Because this qualification is vital to the Advisor Program, the Board may amend this Participation Agreement at any time if the Board decides that the change is needed to meet the requirements of the Code or its applicable regulations, Wisconsin State law, or applicable rules promulgated by the Board.

9. Reports. Voya will send the Participant, at least quarterly, reports that show the value of each Account and activity in the Account during the previous quarter. If applicable, Voya will provide tax reporting as required under the Act, the Code, and any applicable regulations.

10. Amendment and termination. The Board, or the State, as applicable, may from time to time, and without the consent of the Participant or of the Designated Beneficiary, amend the Advisor Program, this Participation Agreement, the Program Description, or Advisor Program rules, and may suspend or terminate the Trust, by giving written notice to the Participant, but the Trust may not thereby be diverted from the exclusive benefit of the Participant and his or her Designated Beneficiaries. Nothing contained in the Program Description, this Participation Agreement, or the Advisor Program rules is an agreement or representation by the Board or any other person that it will continue to maintain the Trust indefinitely.

11. Disputes. Any claim by a Participant against the State, the Wisconsin Department of Administration, the Office of the Wisconsin State Treasurer, the Board, the Advisor Program, or any of their respective officers, employees, or agents made pursuant to this Participation Agreement or the Advisor Program shall be made solely against the assets of the Trust. A Participant who has had a substantial interest affected by a decision of the Board or the State may appeal to the Board or the State, respectively, in writing. The Board or the State shall review the documentation and other submissions and make a determination within 60 days. The Board or the State's appeal determination shall be in writing and returned to the appellant. All appeal decisions of the Board or the State shall be final.

12. Miscellaneous. The substantive laws of Wisconsin will govern this Participation Agreement. The Application is incorporated by reference herein and the Participant's execution of the Application will constitute execution of this Participation Agreement. In the event that any clause, provision, or portion of this Participation Agreement is found to be invalid or unenforceable by a court of competent jurisdiction, that clause or portion will be severed from this Participation Agreement and the remainder shall continue in full force and effect as if such clause or portion had never been included.

13. Definitions. Terms not otherwise defined herein shall have the meaning set forth in the Program Description or Advisor Program rules.